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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

DIMAS RODRIGUEZ, and all others )  
similarly situated under 29 )  
U.S.C. 216 (b), )  
Plaintiffs, ) C.A. NO.  
vs. ) 3:15-cv-03370-  
SHAN NAMKEEN, INC. and ) BK  
SHAILESH PATEL, )  
Defendants. )

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ORAL DEPOSITION OF  
DIMAS RODRIGUEZ  
June 27, 2017

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ORAL DEPOSITION of DIMAS RODRIGUEZ, produced as a  
witness the instance of the Defendants, and duly sworn,  
was taken in the above styled and numbered cause on  
June 27, 2017, from 9:29 a.m. to 4:52 p.m. before Jeff  
L. Foster, a Certified Shorthand Reporter in and for  
the State of Texas, at the offices of J.H. Zidell, 6310  
LBJ Freeway, Suite 112, Dallas, Texas 75240, pursuant  
to the Federal Rules of Civil Procedure and the  
provisions stated on the record.

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A P P E A R A N C E S

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ALSO APPEARING

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Mr. Len Margolis  
Mr. Shailesh Patel

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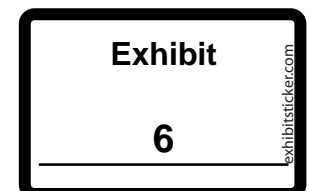
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1 PROCEEDINGS

2 MR. PETERSEN: Okay. And, Counsel, just

3 before we begin with the deposition, under the rules

4 for the Northern District; is that correct?

5 MR. MCCOMBER: That's correct.

6 MR. PETERSEN: And the witness will read

7 and sign.

8 MR. MCCOMBER: Okay.

9 MR. PETERSEN: And if the interpreter

10 could just state his qualifications for the record.

11 THE INTERPRETER: Yes, Jody Quillian,

12 master license number 1583.

13 MR. PETERSEN: Okay. Thank you, Counsel.

14 DIMAS RODRIGUEZ,

15 having been first duly sworn, testified as follows:

16 EXAMINATION

17 BY MR. MCCOMBER:

18 Q. Mr. Rodriguez, can you please state your full

19 name for the record?

20 **A. Dimas Rodriguez.**

21 Q. Where do you live, sir?

22 **A. Carrollton.**

23 Q. What is your address?

24 **A. 1910 Josey Lane, Apartment 159, Carrollton,**

25 **Texas 76005.**

Page 6

1 Q. How long have you lived at that address?

2 **A. Five years.**

3 Q. So since approximately 2012?

4 **A. Yes. Yes.**

5 Q. And you lived there the entire time you worked

6 for Shan Namkeen?

7 **A. You're asking if I lived there?**

8 Q. Did you live there the whole time you worked

9 for Shan Namkeen?

10 **A. Well, before that I lived in another apartment**

11 **and then I moved.**

12 Q. Where did you live prior to living on Josey

13 Lane?

14 **A. Well, it was there on Josey Lane as well, but**

15 **some other apartments.**

16 Q. Do you rent your apartment?

17 **A. Yes.**

18 Q. Did you sign a lease for that apartment?

19 **A. Yes.**

20 Q. Was the lease in English or Spanish?

21 **A. It was in Spanish.**

22 Q. Did you and your wife both sign the lease?

23 **A. Yes.**

24 Q. Where are you currently employed?

25 **A. I'm working for a place called Baker McDuff --**

Page 7

1 **Baker Metals in Dallas.**

2 Q. And how long have you worked for Baker Metals?

3 **A. Well, this month it will be just about a year.**

4 Q. Where did you work prior to Baker Metals?

5 **A. I worked for a company called Sea Cross.**

6 Q. And how long did you work for Sea Cross?

7 **A. Seven months.**

8 Q. And where did you work prior to Sea Cross?

9 **A. With Mr. Patel.**

10 Q. And for the company Shan Namkeen?

11 **A. Yes.**

12 Q. Who do you live with at your home?

13 **A. Just my wife and I have two children.**

14 Q. And what is your wife's name?

15 **A. Ana Maria De La Cruz.**

16 Q. And you have two children?

17 **A. Yes.**

18 Q. And you understand your deposition is being

19 taken today in a lawsuit filed by you against my

20 clients, Shan Namkeen, and some of the people that work

21 with Shan Namkeen?

22 **A. Yes.**

23 Q. Have you ever had your deposition taken

24 before?

25 **A. No.**

Page 8

1 Q. Do you understand your testimony today is

2 under oath just as if you were in front of a judge or

3 jury?

4 **A. Yes.**

5 Q. And the same penalties for truthfulness and

6 perjury apply today?

7 **A. Yes.**

8 Q. Other than this case, have you ever sued

9 anyone before?

10 **A. No.**

11 Q. Have you ever been sued?

12 **A. No.**

13 Q. Have you ever filed for bankruptcy?

14 **A. No.**

15 Q. Do you have a criminal record of any kind?

16 **A. No.**

17 Q. Have you ever been charged with a crime either

18 in the United States or Mexico?

19 **A. No.**

20 Q. Have you ever been arrested in the last ten

21 years?

22 **A. No.**

23 Q. And what are your children's names that live

24 at your home?

25 **A. Luis Armando Rodriguez. Luis Armando**



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1 **Rodriguez, yes. Well, it's Luis Armando De La Cruz.**  
 2 **It's Rodriguez De La Cruz. And then Alejandro**  
 3 **Rodriguez De La Cruz.**  
 4 Q. So you have three total children?  
 5 **A. Well, two boys and a girl, yes.**  
 6 Q. Okay. Do you have a driver's license, sir?  
 7 **A. No.**  
 8 Q. Have you ever had a driver's license?  
 9 **A. Yes.**  
 10 Q. When did you have a driver's license?  
 11 **A. In California.**  
 12 Q. What year was that?  
 13 **A. Well, it would be like in '85 or '86. Well, I**  
 14 **lived there for many years and I had two or three**  
 15 **licenses and they all expired.**  
 16 Q. Have you ever had a Texas driver's license?  
 17 **A. No.**  
 18 Q. Why not?  
 19 **A. Well, I haven't applied for one.**  
 20 Q. Do you drive?  
 21 **A. Yes.**  
 22 Q. Did you drive here today?  
 23 **A. Yes.**  
 24 Q. So you drive illegally?  
 25 **A. Yes.**

Page 10

1 Q. And have you done that the entire time you've  
 2 lived in Texas?  
 3 **A. Yes.**  
 4 Q. Do you have car insurance?  
 5 **A. Yes.**  
 6 Q. Do you own a vehicle?  
 7 **A. Well, no, it's in my wife's name.**  
 8 Q. Does your family have more than one vehicle?  
 9 **A. Yes.**  
 10 Q. How many vehicles?  
 11 **A. Three.**  
 12 Q. What vehicle do you drive regularly?  
 13 **A. A Ford Expedition.**  
 14 Q. And how long have you driven that vehicle?  
 15 **A. It's been a little over a year.**  
 16 Q. Prior to that, what vehicle did you drive?  
 17 **A. A van, a caravan.**  
 18 Q. Like a minivan?  
 19 **A. Yes.**  
 20 Q. And how long did you drive the minivan?  
 21 **A. Like for ten years.**  
 22 Q. Okay. Did you drive the minivan the entire  
 23 time you worked for Shan Namkeen?  
 24 **A. Yes.**  
 25 Q. Are you -- strike that.

Page 11

1 Are you able to understand some English?  
 2 **A. A little.**  
 3 Q. And so I noticed you understood what I asked a  
 4 minute ago, but can you understand some of the things  
 5 I'm saying to you here today?  
 6 **A. No.**  
 7 Q. Are you able to read English at all?  
 8 **A. A little.**  
 9 Q. Are you able to read a newspaper?  
 10 **A. No.**  
 11 Q. What types of things do you read in English?  
 12 **A. Well, for example, important things for me, I**  
 13 **try to do it.**  
 14 Q. So, for example, documents you sign in your  
 15 daily life, you try to read those?  
 16 **A. Yes, I try to read them to understand them.**  
 17 Q. If there's something you don't understand in  
 18 an English document, who do you ask to explain it to  
 19 you?  
 20 **A. Well, I look for people who are closest to me,**  
 21 **people that can help me.**  
 22 Q. And who are those people?  
 23 **A. My children.**  
 24 Q. So your children are able to read and  
 25 understand English?

Page 12

1 **A. Yes.**  
 2 Q. And so if you have something that you need to  
 3 read that you don't understand, you would utilize one  
 4 of your children to do that?  
 5 **A. Yes.**  
 6 Q. Have you talked to anyone at Shan Namkeen  
 7 since you filed this lawsuit in October of 2015?  
 8 **A. No.**  
 9 Q. Have you ever tape recorded any conversation  
 10 with anyone at Shan Namkeen?  
 11 **A. No.**  
 12 Q. Do you have any physical or mental impairment  
 13 that prevents you from telling the truth, sir?  
 14 **A. No.**  
 15 Q. Do you understand that when you sign a  
 16 document in Texas you're deemed to have understood that  
 17 document?  
 18 **A. Yes.**  
 19 Q. And you understand as part of your daily life  
 20 when you sign documents that you're agreeing to be  
 21 bound by the terms of that document?  
 22 **A. Yes.**  
 23 Q. And you understand that's true even if you  
 24 don't fully understand all the English in that  
 25 document?

<p style="text-align: right;">Page 13</p> <p>1 <b>A. Well, no, if I don't understand it, I won't</b>  2 <b>sign it.</b>  3 Q. Right. So if you sign it, you understood that  4 document?  5 <b>A. Yes.</b>  6 Q. And it's your obligation to go get someone  7 else to read it and help you understand it if you don't  8 understand it.  9 <b>A. Yes.</b>  10 Q. And so if you've signed a document, I can --  11 strike that.  12 If you sign a document, you would agree  13 that you've read and understood that document before  14 you signed it?  15 <b>A. Yes.</b>  16 Q. What is your educational background, sir?  17 <b>A. I went up through sixth grade of elementary</b>  18 <b>school in Mexico.</b>  19 Q. Do you hold any professional certifications or  20 license?  21 <b>A. Well, I have my passport and my I.D.</b>  22 Q. And is your passport one of Mexican  23 citizenship?  24 MR. PETERSEN: Objection, relevance. You  25 can answer.</p>	<p style="text-align: right;">Page 15</p> <p>1 <b>take them to work at the company and I took them. And</b>  2 <b>so that day he hired me. Well, he asked me if I wanted</b>  3 <b>to work for him and I said yes, so I stayed there and I</b>  4 <b>worked for him.</b>  5 Q. (BY MR. MCCOMBER) What were you hired to do?  6 <b>A. Well, a little bit of everything.</b>  7 Q. Tell me exactly the things you were doing?  8 <b>A. Oh, I would mix the flour and so I would</b>  9 <b>package or pack the product that they made there.</b>  10 <b>Well, I would sweep and I would mop. We would sweep</b>  11 <b>and we would mop.</b>  12 Q. So when you started working at Shan Namkeen,  13 how many employees would work with you at a time?  14 <b>A. There were six of us.</b>  15 Q. So there were six employees during a shift  16 where product was being made?  17 THE INTERPRETER: And the interpreter is  18 getting clarification.  19 <b>A. Yes, we are the ones that were there</b>  20 <b>permanently and we were in charge, but sometimes</b>  21 <b>Mr. Patel would come and help us.</b>  22 Q. (BY MR. MCCOMBER) And so Mr. Patel, you're  23 referring to Shailesh?  24 <b>A. Yes, every day he was there, but just for a</b>  25 <b>while, because he was the one that would then go and</b></p>
<p style="text-align: right;">Page 14</p> <p>1 <b>A. Well, if the attorney tells me not to answer</b>  2 <b>it, then I won't answer it.</b>  3 MR. PETERSEN: No, you can answer the  4 question.  5 <b>A. Yes, I have it and it's Mexican.</b>  6 Q. (BY MR. MCCOMBER) When did you start working  7 at Shan Namkeen?  8 <b>A. I don't remember the day, but it was June of</b>  9 <b>2013.</b>  10 Q. And how did it come to be that you were hired  11 to work for Shan Namkeen?  12 <b>A. Because a son of mine went there. He was a</b>  13 <b>minor, he was still in school and he was on vacation.</b>  14 <b>And so he was going to work at that company.</b>  15 THE INTERPRETER: And the interpreter is  16 getting clarification.  17 <b>A. And so there was a lady that worked there at</b>  18 <b>the company and one day they didn't have a ride to get</b>  19 <b>back home. And so Mr. Patel's wife gave them a ride</b>  20 <b>and left them like halfway. And so they arrived at the</b>  21 <b>house about 7:00 in the evening. And so then I talked</b>  22 <b>with Shailesh and I asked why didn't she take them all</b>  23 <b>the way to my house or I could have gone to pick them</b>  24 <b>up.</b>  25 <b>And so he said the next day for me to</b></p>	<p style="text-align: right;">Page 16</p> <p>1 <b>distribute his product.</b>  2 Q. And so during the time period you worked at  3 Shan Namkeen, Shailesh was the one who delivered the  4 product to the customers, correct?  5 <b>A. Yes.</b>  6 Q. While you were at Shan Namkeen, did anyone  7 else ever deliver the product to the customers?  8 <b>A. Well, yes, when he wasn't able to do it his</b>  9 <b>wife would or his brother.</b>  10 Q. Anyone else?  11 <b>A. Well, there was another person, Angel and I,</b>  12 <b>and sometimes we would take it to one or two places,</b>  13 <b>but not always.</b>  14 Q. And my question is very specific. Did you  15 ever deliver product to a customer?  16 <b>A. Yes.</b>  17 Q. What customer?  18 <b>A. To a place called -- what's the name of it?</b>  19 <b>Indian Buffet.</b>  20 Q. And when did you do that?  21 <b>A. Well, during the time I was working for him.</b>  22 Q. Can you tell me how often you did that?  23 <b>A. Well, sometimes once a month or twice a month.</b>  24 Q. Did you ever deliver to any other customers of  25 Shan Namkeen?</p>

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1 **A. No.**  
 2 Q. How many employees did it take to run the  
 3 manufacturing process at Shan Namkeen?  
 4 **A. Well, we were always the same ones.**  
 5 Q. And that was a total of six people?  
 6 **A. Well, it was six or seven. I don't remember**  
 7 **exactly. Well, the area I was in there were three of**  
 8 **us.**  
 9 Q. What's the minimum amount of employees it  
 10 would take to run the operation?  
 11 THE INTERPRETER: The interpreter is  
 12 getting clarification.  
 13 **A. Well, during the eight hours that we were**  
 14 **there we were the ones that did everything. I don't**  
 15 **really know how many people were needed.**  
 16 Q. (BY MR. MCCOMBER) So when you worked at Shan  
 17 Namkeen on an eight-hour shift, there was always six  
 18 people there, approximately.  
 19 **A. Yes.**  
 20 Q. Did you ever work at Shan Namkeen by yourself?  
 21 **A. No. Well, during a period of time I would go**  
 22 **and open up and I would be there by myself for maybe an**  
 23 **hour, an hour and a half.**  
 24 MR. MCCOMBER: I'm going to object to the  
 25 nonresponsive portion of that answer.

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1 Q. (BY MR. MCCOMBER) Did your job duties ever  
 2 change at Shan Namkeen from 2013 to 2015?  
 3 **A. No.**  
 4 Q. Who was your direct supervisor at Shan  
 5 Namkeen?  
 6 **A. Well, it would be Mr. Patel's wife Maritsa. I**  
 7 **don't really know what her name is, Maritsa. Well,**  
 8 **they called her Marissa or Maritsa.**  
 9 Q. So Mr. and Mrs. Patel were your supervisors?  
 10 **A. Well, I suppose so.**  
 11 Q. Anyone else?  
 12 **A. Well, also their brother. Well, Mr. Patel's**  
 13 **brother.**  
 14 Q. Who made your work schedule?  
 15 **A. Well, when we would arrive and when we would**  
 16 **leave we would just punch in and punch out on a**  
 17 **computer.**  
 18 Q. And was that true the entire time you were  
 19 there?  
 20 **A. Yes.**  
 21 Q. So when you arrived at work you clocked in on  
 22 a computer and when you left work you clocked out on  
 23 that computer?  
 24 **A. Yes, except for Saturdays and Sundays. On**  
 25 **those days, no.**

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1 Q. On Saturdays and Sundays you claim you worked  
 2 and you didn't clock in on the computer?  
 3 **A. No.**  
 4 Q. Who did you work with on Saturday and Sundays?  
 5 **A. Sometimes the six of us would go and sometimes**  
 6 **even my wife would come and help me.**  
 7 Q. Why did you not clock in on Saturdays and  
 8 Sundays?  
 9 **A. They didn't want us to punch in.**  
 10 Q. Who didn't want you to punch in?  
 11 **A. Well, Marissa or the brother or Mr. Patel,**  
 12 **they were the ones, and the computers were turned off.**  
 13 Q. Why would they not want you to clock in on the  
 14 computer?  
 15 **A. Well, I don't know why. They would just pay**  
 16 **us cash on those days.**  
 17 Q. Did you ever ask why you weren't allowed to  
 18 clock in on the weekends?  
 19 **A. No.**  
 20 Q. You never asked anyone?  
 21 **A. No.**  
 22 Q. Now, I'll tell you the factory was not open on  
 23 Saturday or Sunday, so how is it you were working on  
 24 Saturday and Sunday?  
 25 **A. They opened the factory and they would call us**

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1 **for us to come and work because they had product that**  
 2 **needed to be processed.**  
 3 Q. What evidence do you have that you ever worked  
 4 on a Saturday or Sunday?  
 5 **A. Well, my wife would go with me and they were**  
 6 **also there themselves.**  
 7 Q. Tell me exactly the employees that you claim  
 8 will say you worked on Saturdays and Sundays?  
 9 **A. Well, like Angel, my wife, and then another**  
 10 **lady whose name is Fabiola. Well, on Saturdays it was**  
 11 **mainly just my wife and I, Mr. Patel, his wife, his**  
 12 **brother and sometimes Fabiola would go, but not always.**  
 13 **And my children even went, my daughter Victoria and**  
 14 **also Luis Armando would go sometimes.**  
 15 Q. And is it your testimony on these days when  
 16 these individuals were there you would be making  
 17 product?  
 18 **A. Yes.**  
 19 Q. When is the first time you worked on a  
 20 Saturday or Sunday for Shan Namkeen?  
 21 **A. Well, I don't remember -- I don't remember the**  
 22 **dates, but even before I was hired sometimes I would go**  
 23 **work there on a Saturday and I would go and help my**  
 24 **wife, because she was called to come work there.**  
 25 **But before that they had the company in**

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1 another place in a little room behind the laundromat in  
 2 Carrollton and I would go and help out.  
 3 **(Deposition Exhibit 1 marked.)**  
 4 Q. (BY MR. MCCOMBER) And that -- strike that.  
 5 Shan Namkeen when you worked for them,  
 6 their address was 2731 National Circle, Garland, Texas.  
 7 **A. Yes.**  
 8 Q. And it was there since 2011?  
 9 **A. Well, I was there from 2013 to 2015.**  
 10 Q. Right. So you never -- well, strike that.  
 11 When you said you started working  
 12 weekends before you were even hired, that had to have  
 13 been prior to 2011, because that's when that facility  
 14 moved.  
 15 **A. Well, yes, but they had a room over here in**  
 16 **Carrollton and my wife helped them and I did and then**  
 17 **some other workers as well.**  
 18 MR. MCCOMBER: I'm going to object as  
 19 nonresponsive and move to strike that answer.  
 20 Q. (BY MR. MCCOMBER) I'm going to hand you what  
 21 has been marked Exhibit Number 1. Now, I have reviewed  
 22 the documents you've provided to your lawyers in this  
 23 case. Do you understand that?  
 24 **A. Yes.**  
 25 Q. You have produced no records in this case

Page 22

1 showing that you worked at Shan Namkeen prior to August  
 2 2013.  
 3 THE INTERPRETER: The interpreter is  
 4 going to get clarification.  
 5 **A. Well, I started in 2013 in June. And so up**  
 6 **until December I wasn't punching in. They paid me**  
 7 **cash. They paid me \$40 for eight hours.**  
 8 Q. (BY MR. MCCOMBER) Well, I'm going to show you  
 9 what is Exhibit 1, which shows that you were punching  
 10 in in August 2013.  
 11 **A. No.**  
 12 Q. Is this your signature on Exhibit Number 1?  
 13 **A. Well, they could punch in on the computer**  
 14 **without my being there. They could do that.**  
 15 MR. MCCOMBER: Objection, nonresponsive,  
 16 move to strike.  
 17 Q. (BY MR. MCCOMBER) Is that your signature on  
 18 Exhibit 1?  
 19 **A. Yes.**  
 20 Q. And so when Shan Namkeen after you punched in  
 21 to the computer or whoever punched into the computer,  
 22 if that's your testimony -- strike that.  
 23 When you punched into the computer at the  
 24 end of the week, you would receive a printout showing  
 25 the hours you worked for the week, according to the

Page 23

1 computer.  
 2 **A. No, not always.**  
 3 Q. Well, I'm looking at Exhibit Number 1 and  
 4 these are the weeks that print out from the computer in  
 5 2013. Do you recognize this document?  
 6 **A. No -- well, the signature is mine, but during**  
 7 **that year I did not punch in.**  
 8 Q. Well, look through Exhibit Number 1.  
 9 **A. (The witness complied.)**  
 10 Q. Sir, actually take a look at it and read it.  
 11 **A. (The witness complied.)**  
 12 **(Pause.)**  
 13 **A. This signature is original, all the rest of**  
 14 **them are copies.**  
 15 MR. MCCOMBER: I'm going to object as  
 16 nonresponsive, move to strike your answer.  
 17 Q. (BY MR. MCCOMBER) Is the signature on the  
 18 first page your signature?  
 19 **A. Yes.**  
 20 Q. And that's on Exhibit Number 1?  
 21 **A. Yes.**  
 22 Q. Is your signature on the remaining pages of  
 23 Exhibit Number 1?  
 24 **A. Yes.**  
 25 Q. Did you sign each of those pages?

Page 24

1 **A. Well, yes.**  
 2 Q. And when you received a printout showing the  
 3 time worked for each week, you signed those documents.  
 4 **A. This is not a signature. This is a copy.**  
 5 MR. MCCOMBER: Objection, move to strike.  
 6 Q. (BY MR. MCCOMBER) It will -- just answer my  
 7 question. Your signature is on all the pages of  
 8 Exhibit 1, true?  
 9 **A. Yes.**  
 10 Q. And Exhibit 1 is a copy of those pages that  
 11 were printed out by my client.  
 12 **A. Well, I recognize this. The rest of them I**  
 13 **don't know.**  
 14 **Q. Well, you're under oath today, and so you need**  
 15 **to tell me whether or not these are your signatures on**  
 16 **every page of this Exhibit 1.**  
 17 **A. Yes.**  
 18 Q. So my client is going to testify that each  
 19 week you were given this sheet documenting the hours  
 20 you worked for that week and you signed it to confirm  
 21 that was correct. Do you dispute that?  
 22 **A. Yes.**  
 23 Q. Why would you sign the documents in Exhibit 1  
 24 if they didn't correctly document the hours that you  
 25 worked for that pay period?

Page 25

1 **A. Well, I did sign them, but sometimes they**  
 2 **would give us documents to sign that covered five or**  
 3 **six weeks. They didn't always just give them to us**  
 4 **piecemeal.**  
 5 Q. Did you review those documents to make sure  
 6 they were correct before you signed them?  
 7 **A. No.**  
 8 Q. Why didn't you do that?  
 9 **A. Because it would be on Fridays and we would**  
 10 **have to stay later to clean up and I just really wanted**  
 11 **to get home.**  
 12 Q. So it's not important to you to make sure that  
 13 your pay is correct?  
 14 THE INTERPRETER: The interpreter is  
 15 going to get clarification.  
 16 **A. Well, the check that he would give me, I did**  
 17 **look at that, but not the papers that I signed.**  
 18 Q. (BY MR. MCCOMBER) But you understood earlier  
 19 that if you signed something you're agreeing that you  
 20 understand it and that you agree with it, right?  
 21 **A. Yes.**  
 22 Q. And when you got your check each week you  
 23 looked at it to make sure it was payment in full for  
 24 the hours you worked, didn't you?  
 25 **A. Yes.**

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1 Q. Did you ever tell anyone at Shan Namkeen that  
 2 your check was incorrect and that you were not being  
 3 paid for the hours that you worked?  
 4 **A. Yes.**  
 5 Q. Who did you tell?  
 6 **A. Shailesh, Mr. Patel.**  
 7 Q. And when did you do that?  
 8 **A. Well, on three occasions that they didn't pay**  
 9 **me all of the time that I had worked and then he**  
 10 **rectified that later.**  
 11 Q. So while you worked at Shan Namkeen there were  
 12 three instances when you felt you did not get paid the  
 13 full amount?  
 14 **A. Yes.**  
 15 Q. And you raised that issue with Mr. Patel?  
 16 **A. Yes.**  
 17 Q. And he corrected it?  
 18 **A. Yes.**  
 19 Q. And so you were paid for all of the amount  
 20 that you worked while you were at Shan Namkeen?  
 21 **A. Yes.**  
 22 Q. There was never a time where you worked and  
 23 you didn't get paid for what you worked?  
 24 **A. Well, whatever that I punched in on the**  
 25 **computer it would be here. But any overtime I did that**

Page 27

1 **wasn't reflected on the computer, I wasn't paid for**  
 2 **that. And on Saturdays and Sundays, well, I was paid**  
 3 **cash for that.**  
 4 MR. MCCOMBER: Objection, nonresponsive  
 5 and move to strike that answer.  
 6 Q. (BY MR. MCCOMBER) Did you ever -- strike  
 7 that.  
 8 Did you ever raise with Mr. Patel or  
 9 anyone at Shan Namkeen for the entirety of 2013 --  
 10 strike that. Let me ask a better question.  
 11 Exhibit 1 reflects your time entries for  
 12 2013?  
 13 **A. Yes.**  
 14 Q. Did you ever tell anyone at Shan Namkeen that  
 15 anything in Exhibit 1 was incorrect?  
 16 **A. No.**  
 17 Q. And so the time sheets when you clocked in  
 18 would just be during the week.  
 19 **A. Yes.**  
 20 Q. And so if I'm looking at the first page of  
 21 Exhibit Number 1, do you see that it says you worked 20  
 22 hours the week of August 26th, 2013?  
 23 **A. Yes.**  
 24 Q. Do you know whether you worked that Saturday  
 25 or Sunday?

Page 28

1 **A. Well, I don't remember the exact dates, but I**  
 2 **would go up two or three weekends a month on those**  
 3 **Saturdays.**  
 4 Q. Well, what I'm trying to understand is, if  
 5 you're only working 20 hours during the week, why would  
 6 you be needed to work on the weekend? Why not just run  
 7 those shifts during the week?  
 8 **A. Well, I don't know. He was the one that**  
 9 **planned all of the production, and so if he needed to**  
 10 **do some production on Saturdays and Sundays, well, he**  
 11 **would call us and tell us to go.**  
 12 Q. And who are you referring to?  
 13 **A. Mr. Patel.**  
 14 Q. Do you have -- strike that.  
 15 Can you tell me any date specifically  
 16 that you worked on a Saturday as you sit here today  
 17 under oath?  
 18 **A. No.**  
 19 Q. As you sit here today under oath, can you tell  
 20 me any specific Sunday that you worked at Shan Namkeen?  
 21 **A. Well, I don't know the dates, but there were**  
 22 **many Saturdays, there were many Sundays and I don't**  
 23 **know the dates, but there were many of those days that**  
 24 **I did work -- that we worked.**  
 25 MR. MCCOMBER: I'm going to object as



Page 29

1 nonresponsive, move to strike.  
 2 Q. (BY MR. MCCOMBER) Do you have any document  
 3 that you can show me that shows that you worked on  
 4 either a Saturday or a Sunday at any time from 2013 to  
 5 2015 at Shan Namkeen?  
 6 **A. No.**  
 7 Q. When you say you were paid with cash, who gave  
 8 you the cash?  
 9 **A. Mr. Patel.**  
 10 Q. Did anyone else ever give you cash other than  
 11 Mr. Patel?  
 12 **A. No.**  
 13 **(Deposition Exhibit 2 marked.)**  
 14 Q. (BY MR. MCCOMBER) Now, when you received your  
 15 check at the end of each week, you also received a  
 16 statement that indicated the number of hours you worked  
 17 that week as well as the amount of pay you received per  
 18 hour, correct?  
 19 **A. Yes.**  
 20 Q. And then at the end of each year you worked  
 21 for Shan Namkeen you received a W-2; is that correct?  
 22 **A. Yes.**  
 23 **Q. Do you recognize Exhibit 2 as being the W-2**  
 24 **you received from Shan Namkeen in 2013?**  
 25 **A. Yes.**

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1 **Q. When you received Exhibit 2, did you tell**  
 2 **anyone at Shan Namkeen that it was incorrect?**  
 3 **A. No.**  
 4 **Q. Did you tell anyone Exhibit 2 was incorrect?**  
 5 **A. No.**  
 6 **Q. Exhibit 2 only reflects income you received by**  
 7 **check from Shan Namkeen for hours where you clocked in**  
 8 **on the computer. Do you understand that?**  
 9 **A. Yes.**  
 10 **Q. And you didn't raise that issue with anyone**  
 11 **that the cash you said you were paid was not on Exhibit**  
 12 **Number 2?**  
 13 **A. No.**  
 14 **Q. Did it concern you that Social Security,**  
 15 **Medicare and those type of items were not being**  
 16 **withheld from the cash that you said you received from**  
 17 **Shan Namkeen?**  
 18 **A. No.**  
 19 **(Deposition Exhibit 3 marked.)**  
 20 Q. (BY MR. MCCOMBER) I'm now going to hand you  
 21 Exhibit 3. I'll represent to you that Exhibit 3  
 22 reflects the payments you received from Shan Namkeen in  
 23 2013, according to their payroll records. Do you see  
 24 on Exhibit 3 that the rate of pay you received for 2013  
 25 was \$7.25 per hour?

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1 THE INTERPRETER: Can counsel show --  
 2 MR. MCCOMBER: Sure.  
 3 THE INTERPRETER: -- the interpreter?  
 4 MR. MCCOMBER: There's the hours, there's  
 5 the rate, yeah.  
 6 THE INTERPRETER: Thank you.  
 7 **A. Well, yes, I'm looking at it.**  
 8 Q. (BY MR. MCCOMBER) And so do you dispute that  
 9 you were paid \$7.25 per hour by Shan Namkeen in 2013?  
 10 **A. Well, I disagree with this. I disagree with**  
 11 **this, because -- I disagree with this, because from**  
 12 **June to December in 2013 they paid me cash.**  
 13 Q. You do not -- strike that.  
 14 Were you paid cash in addition to checks  
 15 or were you only paid cash?  
 16 **A. Only cash.**  
 17 Q. Were you paid \$7.25 an hour in 2013?  
 18 **A. Well, they paid me \$40 per eight hours of**  
 19 **work, so what would that come out to?**  
 20 Q. You claim you were paid \$5 an hour in 2013?  
 21 **A. Well, I never really added it up, I just saw**  
 22 **the \$40.**  
 23 Q. Well, as you sit here today, is it your  
 24 testimony you were paid \$5 an hour by Shan Namkeen in  
 25 2013?

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1 **A. Yes.**  
 2 Q. And your testimony today under oath is you  
 3 never received a check for your payment in 2013?  
 4 **A. Not until December, no.**  
 5 Q. December of 2013 is the first time you  
 6 received a check from Shan Namkeen.  
 7 **A. In 2014.**  
 8 Q. So from June 2013 until December 2014 your  
 9 testimony is you were paid only in cash by Shan  
 10 Namkeen?  
 11 **A. Yes.**  
 12 Q. You testified earlier that you received a  
 13 check on Friday.  
 14 **A. Well, on Fridays, yes, when I would punch in**  
 15 **on the computer.**  
 16 Q. Okay. So this -- this makes no sense what  
 17 you're telling me, so let me try to clarify. Are you  
 18 saying you got a check and cash, because you got a  
 19 check on Friday for what you punched into the computer  
 20 and then you got cash for what you worked that you  
 21 didn't punch in on the computer, or are you claiming  
 22 you only got cash?  
 23 **A. Just cash.**  
 24 Q. Until December 2014?  
 25 **A. Until December of 2013.**

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1 Q. Okay.

2 **A. In 2014 is when they started to pay me by**

3 **check.**

4 Q. And so in 2014 did you receive only checks or

5 cash and checks in 2014?

6 **A. Checks and cash.**

7 Q. Is the same true for 2015?

8 **A. Also.**

9 Q. Why would you agree to accept a check for

10 \$7 -- well, strike that.

11 Why would you work for less than \$7.25 an

12 hour in 2013?

13 **A. Well, I needed to work to be able to live.**

14 Q. Did you go look for another job?

15 **A. When I was with him working I didn't look for**

16 **another job.**

17 Q. Did you ever ask why you weren't being paid

18 more than \$5 an hour in 2013?

19 **A. Not during all of 2013, I didn't ask.**

20 Q. What did you do with your cash once you

21 received it from Mr. Patel?

22 **A. Well, I would use it for my own personal**

23 **finances, for my rent and for my bills, for food.**

24 Q. Did you deposit your cash in the bank?

25 **A. No, I didn't have enough to be able to deposit**

Page 34

1 **it.**

2 Q. Did you have a bank account in 2013?

3 **A. I think so, yes.**

4 Q. Do you know what bank it was at?

5 **A. Chase.**

6 Q. Do you still have that Chase Bank account?

7 **A. I still do, yes.**

8 Q. Have you had the same Chase Bank account since

9 2013?

10 **A. I've been with that bank for like 15 years.**

11 Q. Do you have any other bank accounts?

12 **A. No.**

13 Q. Did you ever deposit any cash you received

14 from Mr. Patel into your bank account?

15 **A. No.**

16 Q. Since 2013, have you applied for a loan with

17 any bank?

18 **A. No.**

19 Q. Have you received a payday loan or a title

20 loan or anything like that since 2013?

21 **A. No.**

22 Q. Have you applied for a mortgage since 2013?

23 **A. No.**

24 Q. Do you own any property in the United States

25 or Mexico?

Page 35

1 **A. In Mexico.**

2 Q. Do you own a farm in Mexico?

3 **A. Well, not a farm, but I have some property**

4 **that I use for agriculture.**

5 Q. Do you have an agricultural business in

6 Mexico?

7 **A. No.**

8 Q. What type of agricultural work do you do on

9 your farm?

10 **A. Well, we plant corn and beans, peaches,**

11 **apples. And then also we plant wheat for the cattle.**

12 Q. And so you have cattle in addition to planting

13 that occurs on your farm?

14 **A. No.**

15 Q. Do you have employees?

16 **A. I have three children who work there.**

17 **(Deposition Exhibit 4 marked.)**

18 Q. (BY MR. MCCOMBER) You indicated earlier that

19 you talked to Mr. Patel on three occasions when you

20 felt that your pay was incorrect, correct?

21 **A. Yes.**

22 Q. Did you ever talk to him and say that you were

23 underpaid for your hourly rate?

24 **A. No.**

25 Q. Never did that?

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1 **A. No.**

2 Q. Did you ever tell him that you felt you were

3 not paid correctly for overtime?

4 **A. No.**

5 Q. Do you think that if you had talked to

6 Mr. Patel he would have tried to work something out

7 with you?

8 MR. PETERSEN: Objection, calls for

9 speculation. You can answer.

10 **A. Well, I never did ask him those questions, but**

11 **in 2014 I did ask for a raise and he did give me a one**

12 **dollar raise.**

13 Q. (BY MR. MCCOMBER) And so you told him on

14 three occasions your check was incorrect and he fixed

15 that, right?

16 **A. Yes.**

17 Q. You asked him for a raise and he gave you a

18 raise, correct?

19 **A. Yes.**

20 Q. You asked him for advances on your paycheck

21 regularly and he gave you those advances whenever you

22 asked for them.

23 **A. Well, later when I would ask it of him he**

24 **would give that to me like a week later or two weeks**

25 **later.**

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1 Q. But he did give you advances on your paycheck  
 2 if you asked for them, right?  
 3 **A. Well, he lent me money, but he never gave me**  
 4 **an advance.**  
 5 Q. And so -- but he lent you money whenever you  
 6 asked for it, didn't he?  
 7 **A. Yes, because I didn't have enough for all of**  
 8 **my finances with what I was earning, so he did lend me**  
 9 **some money.**  
 10 Q. Did you appreciate that or not?  
 11 **A. Yes.**  
 12 Q. And so whenever you asked him for these type  
 13 of things he helped you, didn't he?  
 14 **A. Yes.**  
 15 Q. Then what makes you think if you had talked to  
 16 him about your claim that you were underpaid that he  
 17 would not have worked something out with you?  
 18 **A. Well, I never thought about talking to him.**  
 19 Q. Was it not very important to you?  
 20 **A. Well, it was important for me, but I was**  
 21 **appreciative of the fact that he gave me work.**  
 22 Q. But you understand Mr. Patel can't fix a  
 23 problem unless you tell him about it.  
 24 **A. Yes.**  
 25 Q. Do you take some responsibility because you

Page 38

1 didn't talk to Mr. Patel?  
 2 **A. Well, I just never thought about doing it, and**  
 3 **he didn't say anything to me either.**  
 4 **Q. Do you think Mr. Patel intentionally tried to**  
 5 **harm you in any way?**  
 6 **A. No.**  
 7 **Q. Do you think -- Mr. Patel was generous with**  
 8 **you, wasn't he?**  
 9 **A. Yes.**  
 10 **Q. And he was generous to your family.**  
 11 **A. Yes.**  
 12 Q. Why didn't you give him an opportunity to work  
 13 out your dispute with him?  
 14 **A. Well, I don't have anything bad to say about**  
 15 **him. He's a good person. But if he's so good, why**  
 16 **didn't he pay those overtime hours that he owed me?**  
 17 **Why did he take those away from me? And I just never**  
 18 **said anything.**  
 19 MR. MCCOMBER: Objection, nonresponsive,  
 20 move to strike.  
 21 **Q. (BY MR. MCCOMBER) Looking at Exhibit Number**  
 22 **4, these are the printouts for the computer clock**  
 23 **in/clock out for 2014. Do you see that? Yes?**  
 24 **A. Yes.**  
 25 **Q. And your signature is on the documents in**

Page 39

1 **Exhibit 4, correct?**  
 2 **A. Yes.**  
 3 **Q. Which shows that you looked at those documents**  
 4 **and signed it?**  
 5 **A. Yes.**  
 6 Q. Did you ever tell Mr. Patel or anyone at Shan  
 7 Namkeen that any of these hour reports were incorrect  
 8 in 2014?  
 9 **A. Yes.**  
 10 Q. Which one?  
 11 **A. Well, I talked to him about -- on Fridays when**  
 12 **they had us work a half an hour later. And so when we**  
 13 **would go punch out on the computer, the computer was**  
 14 **already turned off. And I talked to him about that on**  
 15 **two occasions and I asked him why they did that. And**  
 16 **he said he was going to fix that problem, but he never**  
 17 **did.**  
 18 Q. Did you ask him to pay you for any hours you  
 19 worked past 4:00 o'clock?  
 20 **A. No.**  
 21 Q. Well, I want to have you turn to page SNI 52  
 22 in Exhibit Number 4. Do you see that page?  
 23 **A. Yes.**  
 24 Q. On March 24th, 2014 you clocked out at  
 25 4:10 p.m. Do you see that?

Page 40

1 **A. Yes.**  
 2 Q. On March 25th, 2014 you clocked out at  
 3 4:10 p.m. as well, correct?  
 4 **A. Yes.**  
 5 Q. On March 28th, 2014 you clocked out at  
 6 4:10 p.m. as well, correct?  
 7 **A. Yes. Why always at the same time, the same**  
 8 **hour?**  
 9 Q. There may be a point in time when we can ask  
 10 some questions, but hold on and let me get through this  
 11 part.  
 12 Looking at Exhibit 4, SNI 63 -- looking  
 13 at this document in Exhibit 4, on June the 9th, 2014  
 14 you clocked out at 4:10 p.m. Do you see that?  
 15 **A. Yes.**  
 16 Q. And on June 12th, 2014 you clocked out at  
 17 4:10 p.m., correct?  
 18 **A. Yes.**  
 19 Q. And on other days that week you clocked out at  
 20 4:00 p.m., correct?  
 21 **A. Yes.**  
 22 Q. Looking ahead in Exhibit 4 to SNI 65, on June  
 23 26th, 2014 you clocked out at 4:10 p.m. Do you see  
 24 that?  
 25 THE INTERPRETER: And the interpreter is

Page 41

1 going to need clarification.

2 **A. Well, my -- the hour -- the time that I left**

3 **was 4:00 o'clock, but here it says 4:10, so where they**

4 **say 4:10, I don't know about that.**

5 Q. (BY MR. MCCOMBER) So you disagree with these

6 time records that show you clocking out after

7 4:00 o'clock p.m.?

8 **A. Yes, I'm in disagreement with that, because**

9 **they would punch us out and also sometimes punch us in.**

10 **Sometimes when I would arrive in the morning I was**

11 **already punched in. In fact, Angel punched all of us**

12 **in and out.**

13 Q. So some days you would be clocked in before

14 you even got to work?

15 **A. Yes. Sometimes I was already punched in, yes.**

16 **And when I was on my way to work I was already punched**

17 **in. It might be Angel or him or his wife.**

18 Q. So do you think you were ever underpaid for

19 hours on the time clock in 2014?

20 **A. Those ten minutes I was never paid for. I**

21 **would work my eight hours, but those ten minutes we**

22 **were never paid for.**

23 Q. So it's your testimony that the hours set

24 forth on these time sheets in 2014 you were not paid

25 for?

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1 **A. Those minutes --**

2 THE INTERPRETER: And the interpreter is

3 going to need clarification.

4 **A. If we worked 16 hours or 24 hours, they did**

5 **pay us for that.**

6 Q. (BY MR. MCCOMBER) So you're saying if it was

7 over at 4:00 o'clock, you didn't paid for that period

8 of time that was clocked out later than 4:00 o'clock?

9 **A. Well, no, and, in fact, when I would leave at**

10 **4:00 o'clock I would have to drive from Garland to**

11 **Carrollton, taking product with me. My wife would pack**

12 **that up and I didn't get paid for that and that was at**

13 **least an hour's worth of work. And then I had to take**

14 **it back the next day.**

15 MR. MCCOMBER: I'm going to object as

16 nonresponsive, move to strike your answer. Why don't

17 we take a quick break.

18 THE WITNESS: Okay.

19 (Recess taken.)

20 Q. (BY MR. MCCOMBER) Before we took the break,

21 Mr. Rodriguez, we were talking about the employee time

22 detail from 2014 which is Exhibit 4. Do you recall

23 that?

24 **A. Yes.**

25 Q. Now, you indicated earlier that you believe

Page 43

1 there were times when you were clocked in early for a

2 shift and times that you clocked out early for shifts.

3 Do you remember that?

4 **A. Well, if there was no more work and then we**

5 **left work early, then we would punch out early.**

6 Q. But my point is on any given day you said that

7 you may have already been clocked in by the time you

8 arrived at work, correct?

9 **A. Well, no, but when I would get to work, I**

10 **don't know who did it, but I was already punched in.**

11 Q. Did you ever look at your time sheet and

12 determine if there were any hours that you were not

13 paid for during a given week in 2014?

14 **A. No.**

15 Q. You simply signed the documents in Exhibit 4

16 indicating that they were correct?

17 **A. Yes.**

18 Q. And you never talked to Mr. Patel about it?

19 **A. No.**

20 Q. Now, looking through Exhibit 4, are you able

21 to tell me any of these weeks in 2014 where you worked

22 on either a Saturday or a Sunday that are not reflected

23 in Exhibit 4?

24 **A. Yes, there are a lot of them.**

25 Q. Tell me the first day.

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1 **A. I don't have the exact date, but per month we**

2 **would go two or three times a month.**

3 Q. Can you give me any date that you worked in

4 2014 on either a Saturday or a Sunday?

5 **A. No.**

6 Q. Do you understand that in a typical eight-hour

7 shift at Shan Namkeen you can produce 400 bags of

8 product?

9 **A. Okay.**

10 THE INTERPRETER: The interpreter is

11 going to get clarification.

12 **A. Well, I was able to even do 600 bags during**

13 **five hours of work from 10:00 to 3:30 or 4:00.**

14 Q. (BY MR. MCCOMBER) How many bags did you make

15 during a shift on either a Saturday or a Sunday?

16 **A. Well, it was the same thing. It would depend**

17 **on how much time I was working there. There was a line**

18 **there and it couldn't be stopped and I had to pack**

19 **everything that was coming down the line.**

20 Q. And so you testified today that you worked two

21 to three days a month on either a Saturday or a Sunday,

22 correct?

23 **A. Yes.**

24 Q. And that's when you claim you were paid cash

25 for your time?

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1 **A. Yes.**  
 2 Q. And there's no record anywhere of that?  
 3 **A. No.**  
 4 Q. During those eight-hour weekend shifts, how  
 5 many bags would be made in each shift on average?  
 6 **A. Well, it would depend. It wasn't an exact**  
 7 **amount. Well, there were these boxes and each box had**  
 8 **20 bags in it. And so sometimes we would put 15, 20,**  
 9 **up to 32 bags in there during the five hours that we**  
 10 **worked.**  
 11 Q. And so are you able to estimate approximately  
 12 how many bags you would make per shift on a weekend?  
 13 **A. Well, the least amount was between 400 and 600**  
 14 **bags during the shift that I worked.**  
 15 Q. And what was the most that was done?  
 16 **A. Well, 600 or 650, because the machine couldn't**  
 17 **do more.**  
 18 Q. So the maximum that could happen was 600 to  
 19 650 per eight-hour shift?  
 20 **A. And -- well, that was during a five-hour**  
 21 **shift, because it was a process. First the flour had**  
 22 **to be mixed and then went through a cooking process**  
 23 **before other things could be done, and then during two**  
 24 **hours we had to be doing other things besides that.**  
 25 Q. And so that whole process took around eight

Page 46

1 hours?  
 2 **A. Yes.**  
 3 Q. And that's what you did on the weekends you  
 4 say you worked?  
 5 **A. Yes.**  
 6 Q. And tell me, once that product was made  
 7 **Mr. Patel would deliver it to restaurants and grocery**  
 8 **stores in the Dallas-Fort Worth area?**  
 9 **A. Yes. Yes, he had his contracts. He also sent**  
 10 **products to Austin and Houston.**  
 11 Q. Did he deliver the products to Austin or  
 12 Houston?  
 13 **A. No, a truck would arrive and then be loaded.**  
 14 Q. And would the product go to grocery stores and  
 15 restaurants in Austin and Houston?  
 16 **A. I don't know about that.**  
 17 Q. Do you know -- strike that.  
 18 Did the product mostly go to restaurants  
 19 or did it mostly go to grocery stores?  
 20 **A. I don't know.**  
 21 Q. Do you know of any customers that Mr. Patel  
 22 sent product to that were not in Austin, Houston or  
 23 Dallas-Fort Worth?  
 24 **A. No.**  
 25 Q. Did you ever send product to anyplace other

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1 than in Texas?  
 2 **A. No.**  
 3 Q. Do you know of any customer that purchased  
 4 product from Shan Namkeen outside the state of Texas?  
 5 **A. No. I didn't check on that, I just worked.**  
 6 Q. So you don't know anything about who the  
 7 customers for Shan Namkeen were?  
 8 **A. No.**  
 9 Q. Are you aware of where Shan Namkeen purchased  
 10 the equipment to make their product?  
 11 **A. No.**  
 12 Q. Are you aware of where Shan Namkeen purchased  
 13 the products to make its snack cakes?  
 14 **A. You mean the flour and all of that? I don't**  
 15 **know.**  
 16 Q. So you don't know where any of the ingredients  
 17 were purchased to make Shan Namkeen's products, do you?  
 18 **A. Well, I did see that the wrappers came from**  
 19 **India, but as far as the flour -- well, I saw that it**  
 20 **would arrive, but I didn't really pay attention on**  
 21 **that. I was just focused on doing my job.**  
 22 Q. Do you know whether these packages, which you  
 23 think had -- were from India, came from someplace  
 24 locally or were they shipped from India?  
 25 **A. They were shipped from India to here. They**

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1 **came on a car of a train.**  
 2 Q. How do you know that?  
 3 **A. Well, it would arrive to where we worked and**  
 4 **we would unload it.**  
 5 Q. Did you use any of the ingredients that came  
 6 from India as part of your job?  
 7 **A. No.**  
 8 Q. Did you handle any ingredients or packaging as  
 9 part of your job that was not purchased in Texas?  
 10 **A. No.**  
 11 Q. Did you make any products at Shan Namkeen that  
 12 were sold outside of Texas?  
 13 **A. No.**  
 14 Q. Did you use the telephone at any time when you  
 15 were at Shan Namkeen to conduct Shan Namkeen business?  
 16 **A. No.**  
 17 Q. Did you use any shipping or U.S. Postal  
 18 Service services while you were working at Shan  
 19 Namkeen?  
 20 **A. No.**  
 21 Q. So you weren't involved with the shipping of  
 22 the products at Shan Namkeen?  
 23 **A. No.**  
 24 Q. Is it your recollection that the majority of  
 25 the products that were made were delivered by Mr. Patel



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1 to local groceries and restaurants?

2 **A. Yes.**

3 Q. What types of products does Shan Namkeen make?

4 **A. Well, it's just a lot of Indian food.**

5 Q. Is it a snack food, a savory snack food?

6 **A. Well, I don't know how they use it. Well,**

7 **it's like us when we use a tortilla for our food.**

8 **Well, and I think that they use it, you know, like the**

9 **pita and the -- I really don't eat their food, so I**

10 **really don't have any idea, but I think they use it and**

11 **they mix it with their food.**

12 Q. Did you take lunch breaks during an eight-hour

13 shift at Shan Namkeen?

14 **A. Half an hour, yes.**

15 Q. Every day?

16 **A. Yes.**

17 Q. And you never worked through lunch?

18 **A. No.**

19 Q. Where was the computer located that you would

20 clock in and out of at Shan Namkeen?

21 **A. Well, it's in the area where we work on a**

22 **little table.**

23 Q. Is there any other device or worksheet that

24 keeps track of the hours worked at Shan Namkeen other

25 than that computer?

Page 50

1 **A. Well, there they have their office and --**

2 **well, they have it.**

3 Q. Are you aware of any separate timekeeping

4 documents other than the computer?

5 **A. Well, they would do their work in the office**

6 **and then they would print it out on the computer where**

7 **we would punch in and out.**

8 Q. And then you would sign that document,

9 correct?

10 **A. Yes.**

11 Q. We already talked about that?

12 **A. Yes.**

13 Q. And you didn't keep any separate time --

14 strike that.

15 And you didn't keep track of your time in

16 any separate way, did you?

17 **A. No.**

18 Q. And you were paid on a weekly basis at Shan

19 Namkeen?

20 **A. Yes.**

21 Q. Every Friday?

22 **A. Yes, regularly Fridays.**

23 Q. If you worked on the weekend, were you paid

24 the following Friday or were you paid in cash the day

25 you worked?

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1 **A. That day when we finished they would pay us.**

2 Q. Were you ever paid more than \$5 an hour in

3 cash at any time from 2013 to 2015?

4 **A. I think so.**

5 Q. When did that change?

6 **A. Well, he would pay us what he wanted to pay**

7 **us, whatever he happened to have in his wallet.**

8 **Sometimes it would be 50, it would be 40, it would be**

9 **60. I never asked. I was in agreement with whatever**

10 **he paid me.**

11 Q. So for an eight-hour shift on the weekend, is

12 it your testimony sometimes you were paid \$5 an hour?

13 **A. I think so.**

14 Q. And sometimes you were paid 6.25 an hour?

15 **A. Yes.**

16 Q. And sometimes you were paid \$7.50 an hour?

17 **A. Yes, because the pay would be different. Of**

18 **course, when it was more, then it was more.**

19 Q. Did you keep track of the days that you were

20 paid \$7.50 an hour versus the days you were paid \$5 an

21 hour?

22 **A. No, I was just content with whatever he paid**

23 **me. That was all.**

24 Q. But in this lawsuit you're seeking money for

25 time you say you spent on a Saturday that you were not

Page 52

1 paid correctly. Do you understand that?

2 **A. Yes.**

3 Q. How much money is that that you want from my

4 client?

5 **A. Well, I don't really have the exact time that**

6 **I worked during that time.**

7 Q. But you filed a lawsuit asking my client for

8 that money.

9 **A. Well, I'm not really even asking for a certain**

10 **amount, an exact amount, I just want the time that I**

11 **worked to be tallied up and for me to be paid according**

12 **to that time. I don't really have an exact amount.**

13 Q. How can we tally up that time when you didn't

14 keep track of it?

15 **MR. PETERSEN: Objection, calls for a**

16 **legal conclusion. You can answer.**

17 **A. I don't know.**

18 Q. (BY MR. MCCOMBER) Well, my client is going to

19 testify that you were paid correctly for all the time

20 that you worked, and that in Exhibit 4 and the other

21 exhibits you've seen they tracked your time correctly.

22 Do you have any documents that dispute the records from

23 my client?

24 **A. No.**

25 **MR. PETERSEN: Object to the sidebar**

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1 regarding the defendant's testimony. At least one of  
 2 them is in the room and has not been deposed. You can  
 3 answer.  
 4 Q. (BY MR. MCCOMBER) Now, you said earlier you  
 5 delivered once or twice a month product to Indian  
 6 Buffet. Do you remember that?  
 7 **A. Yes.**  
 8 Q. And that's a true statement?  
 9 **A. Yes.**  
 10 Q. When you went to Indian Buffet, how did you  
 11 determine how much product to bring in to them?  
 12 **A. Well, when I would clock out and it was**  
 13 **4:00 o'clock and that Indian Buffet was close to where**  
 14 **I lived, he would give me the amount that I had to**  
 15 **deliver. I would just go there and deliver it.**  
 16 Q. Did you talk to anyone at Indian Buffet?  
 17 **A. Well, I would just enter and just deliver it**  
 18 **to the person that was there, some person who was in**  
 19 **charge that had a little office there.**  
 20 Q. Did you bring any documents with you for  
 21 Indian Buffet to sign?  
 22 **A. I would just leave the product there and he**  
 23 **would tell me, "Just tell them to call me or I'll call**  
 24 **them." I would just arrive and deliver the product.**  
 25 Q. Was there any day of the week that you

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1 delivered the product to Indian Buffet?  
 2 **A. Well, it wasn't an exact day, it could be**  
 3 **Monday, it could be a Tuesday. It was during the days**  
 4 **that I worked for him.**  
 5 Q. Who is the person that you talked to at Indian  
 6 Buffet?  
 7 **A. Well, it was a lady that worked there and I**  
 8 **didn't even ask her name. I would just say, "Well,**  
 9 **here, this is what they're delivering to you and see**  
 10 **you later."**  
 11 Q. And you didn't have them sign any documents  
 12 from Shan Namkeen?  
 13 **A. Nothing.**  
 14 Q. And they didn't give you any form of payment?  
 15 **A. No.**  
 16 Q. How much product did you deliver to Indian  
 17 Buffet at any given time?  
 18 **A. Well, it would be two, three or four boxes.**  
 19 Q. And you think you did this once or twice a  
 20 month?  
 21 **A. Yes.**  
 22 Q. And that's the only customer you ever  
 23 delivered to?  
 24 **A. Sometimes -- well, sometimes it would be**  
 25 **different people. Sometimes there would be a man,**

Page 55

1 **sometimes it would be a woman.**  
 2 Q. But it was always at Indian Buffet?  
 3 **A. I only went there.**  
 4 Q. Who asked you to make that delivery?  
 5 **A. It would be Mr. Patel. If he wasn't there,**  
 6 **then his wife would ask me to take it.**  
 7 Q. Did you do it as a favor to Mr. and Mrs.  
 8 Patel?  
 9 **A. Well, yes.**  
 10 Q. And it was on your way home?  
 11 **A. Well, it was a little bit farther past my**  
 12 **house, maybe 15 minutes past. I would go there and**  
 13 **deliver it and come back to my house.**  
 14 Q. Did you ever ask to be paid for making those  
 15 trips?  
 16 **A. I never asked him for money as far as my work**  
 17 **for other things, just what's on here.**  
 18 Q. In Exhibit 4?  
 19 **A. Yes.**  
 20 Q. Do you know if Mr. Patel ever included some  
 21 time for those deliveries in your time cards for  
 22 Exhibit 4?  
 23 **A. No.**  
 24 Q. How do you know that?  
 25 **A. Well, I knew more or less the hours that I had**

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1 **worked and what would be on my check and I never saw**  
 2 **any extra hours on my check.**  
 3 Q. I thought you testified earlier that you never  
 4 looked at these in great detail like that.  
 5 **A. Well, not so much this, but my check, I always**  
 6 **had it in my mind how many hours I worked and how much**  
 7 **I was going to get paid. So ever since I started**  
 8 **working there I had that mentally down as far as what**  
 9 **should be on my check.**  
 10 Q. So you would sign the documents in Exhibit 4,  
 11 because you thought they were correct, right?  
 12 **A. Yes.**  
 13 Q. And you never asked Mr. Patel for more money  
 14 for time you spent delivering to Indian Buffet?  
 15 **A. No, never.**  
 16 Q. Do you think he would have paid you for that  
 17 time if you asked for it?  
 18 **A. I don't know. I never did it. Well, I'm the**  
 19 **type of person that -- one day he sent me out to get**  
 20 **some food and three pennies were left over and I gave**  
 21 **him back those three pennies. I'm not the type of**  
 22 **person that asks for something that I don't deserve to**  
 23 **have.**  
 24 Q. So you didn't ask for money for the deliveries  
 25 because you didn't believe you deserved money for it?

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1 **A. Well, as far as my capacity, the way that I**  
 2 **am, that's just not the way that I am to ask for more**  
 3 **money.**  
 4 Q. Well, you asked Mr. Patel for a raise, didn't  
 5 you?  
 6 **A. Well, that has to do with work that I'm doing.**  
 7 **I'm not asking that to be given to me as a present,**  
 8 **it's for work that I'm doing for him.**  
 9 Q. Then why wouldn't you ask if you believed you  
 10 were doing work doing deliveries that you were not  
 11 getting paid for, to ask for that money?  
 12 **A. Well, because he asked me to do that as a**  
 13 **favor, and so I did it.**  
 14 Q. And you agreed to do it as a favor?  
 15 **A. Yes.**  
 16 Q. And you agreed to do it without getting paid?  
 17 **A. Well, I never thought that he would pay me for**  
 18 **that and he didn't, and so that's just the way it was.**  
 19 Q. So you did it as a favor.  
 20 **A. Yes.**  
 21 Q. And you said when you made deliveries to the  
 22 other -- strike that.  
 23 **And when you said earlier you made**  
 24 **deliveries from Shan Namkeen to the laundromat, you**  
 25 **made those deliveries as a favor as well?**

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1 **A. No, I did that on my own volition and he never**  
 2 **forced me to do it. I just did it to help.**  
 3 Q. And your family would help Mr. Patel's family  
 4 from time to time, right?  
 5 **A. Well, my wife worked for eight hours -- I**  
 6 **mean, my -- my wife worked for eight hours for his wife**  
 7 **and then she also did some packing there at that**  
 8 **laundromat.**  
 9 MR. MCCOMBER: I'm going to move to  
 10 strike as nonresponsive.  
 11 Q. (BY MR. MCCOMBER) The real point was,  
 12 Mr. and Mrs. Patel did favors for your family as well,  
 13 right?  
 14 **A. Well, not really favors. I mean, we did work**  
 15 **for them and they paid us for that work.**  
 16 Q. But the Patels also gave you and your wife  
 17 loans when you needed them, right?  
 18 **A. Yes, and we paid everything back. We always**  
 19 **paid everything back. We don't owe them anything.**  
 20 Q. But I'm saying that was a favor they did for  
 21 you like the favors you did for them in making these  
 22 deliveries.  
 23 **A. Well, yes.**  
 24 Q. And they didn't charge you interest on the  
 25 loans, did they?

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1 **A. No.**  
 2 Q. And then you didn't charge them for these  
 3 deliveries you made from time to time?  
 4 **A. No.**  
 5 Q. Do you think that's fair?  
 6 **A. Well, yes. I'm appreciative of what he lent**  
 7 **me. And so what's here is here, but what I'm talking**  
 8 **about is what I worked and what I wasn't paid for.**  
 9 Q. And what is that?  
 10 **A. Well, one would suppose that Saturdays and**  
 11 **Sundays was overtime. And so all of the times that I**  
 12 **punched in and out of here, then I would work an hour**  
 13 **extra to go to the laundromat to unload the product**  
 14 **there.**  
 15 Q. Well, you just told me you did that as a  
 16 favor.  
 17 **A. Well, yes, that's true.**  
 18 Q. So do you want to get paid for that or not?  
 19 **A. Yes, I would like to have some compensation**  
 20 **for that.**  
 21 Q. For something you did as a favor?  
 22 **A. Well, yes, because of the favor that I did for**  
 23 **him and also I did a lot of favors for him as far as**  
 24 **the work that I did for him. The favors that he did**  
 25 **for me I paid those back. But he hasn't paid me for**

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1 the favors that I did for him.  
 2 Q. Well, you understand that according to the  
 3 time sheets in Exhibit 4 that there are weeks that even  
 4 if you worked eight hours on Saturday or Sunday you  
 5 would still not reach 40 hours for the week?  
 6 **A. Well, yes, I understand that, but sometimes we**  
 7 **would work four or five days and then it was Saturdays**  
 8 **and Sundays.**  
 9 Q. And that's my point. How am I supposed to  
 10 know looking at Exhibit 4 which weeks you worked more  
 11 than 40 hours?  
 12 **A. Well, I never -- I don't have any documents,**  
 13 **so I didn't keep any or record any documents, I just**  
 14 **know and my wife knows the hours that we worked.**  
 15 Q. But if we were trying to pick the week where  
 16 you claim you were owed overtime, you would have to  
 17 guess?  
 18 **A. Well, perhaps if I really thought about it**  
 19 **I could remember it. But what I'm saying is during the**  
 20 **time I worked there I would go two or three weekends**  
 21 **per month to do this extra work.**  
 22 Q. Look through Exhibit 4 and tell me the work  
 23 weeks in which you worked more than 40 hours per week.  
 24 **A. Well, it's not going to be there. Because in**  
 25 **these documents they never let it be more than 40**

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1 **hours. After that, then they just paid you cash.**  
 2 Q. Now, let's look at Exhibit 4, then, and go  
 3 through this by week. Did you work more than 40 hours  
 4 for Shan Namkeen the week of December 28th, 2013?  
 5 **A. I don't remember.**  
 6 Q. Turn the page to the next page in Exhibit 4.  
 7 **A. (The witness complied.)**  
 8 Q. Did you work more than 40 hours the week of  
 9 January 9th, 2014?  
 10 **A. Well, there are the days.**  
 11 MR. MCCOMBER: Objection, nonresponsive.  
 12 Q. (BY MR. MCCOMBER) As you sit here today are  
 13 you able to tell me whether the week of January 9th,  
 14 2014 you worked more than 40 hours?  
 15 **A. Well, no, they aren't here. I don't remember.**  
 16 Q. And you don't have a remembrance if you worked  
 17 any additional days that week that are not on this  
 18 list.  
 19 **A. No.**  
 20 Q. And we could go through the entire Exhibit 4  
 21 and your answer would be the same for each week.  
 22 **A. Yes. Well, here it's more than -- it's 42**  
 23 **hours.**  
 24 Q. Which are you referring to?  
 25 **A. Well, here it's 42 hours. Where does it say**

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1 **that it's overtime?**  
 2 THE INTERPRETER: Interpreter comment.  
 3 This is SNI 0044. SNI 44.  
 4 Q. (BY MR. MCCOMBER) Yeah, that's the number of  
 5 hours you were listed as working that week, correct?  
 6 **A. Yes.**  
 7 Q. And then you would get a check later for the  
 8 hours you worked, right?  
 9 **A. Yes.**  
 10 Q. And the testimony that I've seen and the  
 11 documents I've seen reflect that on weeks you worked  
 12 more than 40 hours you were paid overtime for that  
 13 amount.  
 14 **A. Well, they never paid me overtime. There was**  
 15 **just one time when he went on vacation to India with**  
 16 **his wife, the whole family, like for a month -- well,**  
 17 **three weeks or a month. So everyone would start work**  
 18 **at 7:00, but I would start at 6:00 to open up the**  
 19 **place. And so I am conscious of the fact that they**  
 20 **paid me overtime for that amount of time, but after**  
 21 **that, no more.**  
 22 Q. Did you ever check your check stubs to see if  
 23 you were getting overtime or not?  
 24 **A. Yes. Yes, and I did see them on there for**  
 25 **that time.**

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1 Q. Take a look at Exhibit 5. Do you recognize  
 2 Exhibit 5?  
 3 **A. Well, I didn't sign this. It's not signed by**  
 4 **me.**  
 5 Q. These are your documents you produced in this  
 6 case.  
 7 **A. Okay. That's okay, yes.**  
 8 Q. If you look in the bottom right-hand corner,  
 9 do you see how it says PL?  
 10 **A. Yes.**  
 11 Q. That means those are your documents.  
 12 **A. Okay.**  
 13 Q. Did you provide these documents to your  
 14 lawyer?  
 15 **A. Yes.**  
 16 Q. And these are the check stubs you received  
 17 after working a week at Shan Namkeen?  
 18 **A. Yes.**  
 19 Q. After receiving any of the check stubs in  
 20 Exhibit 5, did you ever complain to Mr. Patel or anyone  
 21 at Shan Namkeen that they were incorrect?  
 22 **A. No.**  
 23 Q. Is this your writing on the front page of  
 24 Exhibit 5?  
 25 **A. No, that isn't my handwriting.**

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1 Q. Do you know whose it could be?  
 2 **A. No.**  
 3 Q. Did you ever receive a bonus from Shan Namkeen  
 4 for the holidays?  
 5 **A. Well, on Christmas I remember the first year I**  
 6 **was given a hundred dollars and then the second year**  
 7 **\$50.**  
 8 Q. So in 2013 did you receive a hundred dollars?  
 9 **A. Yes.**  
 10 Q. And then if you look at the last page of  
 11 Exhibit 5, it appears you received a hundred dollar  
 12 bonus in December of 2014.  
 13 **A. That bonus is what he gave me at Christmas?**  
 14 Q. It says bonus. That's what I'm asking you.  
 15 **A. He never gave me a bonus, just those two times**  
 16 **that he gave me that money at Christmas.**  
 17 Q. And that was 2013, 2014.  
 18 **A. Yes.**  
 19 Q. And do you have any reason to dispute that you  
 20 got a hundred dollars in December of 2014 as a bonus?  
 21 **A. No, I don't know.**  
 22 **(Deposition Exhibit 6 marked.)**  
 23 Q. (BY MR. MCCOMBER) I'm going to hand you  
 24 Exhibit 6. Is Exhibit 6 the W-2 you received from  
 25 Shan Namkeen in 2014?

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1 **A. Yes, I have it.**  
 2 **Q. Did you ever tell anyone at Shan Namkeen that**  
 3 **this W-2 was incorrect, because it didn't include these**  
 4 **cash payments that you believe you received?**  
 5 **A. No. No, I never asked anything.**  
 6 **Q. Did you ever tell anyone that it was**  
 7 **incorrect?**  
 8 **A. No, I would just take this for them to fill**  
 9 **out all the documents for my taxes every year and I**  
 10 **never told them anything, I just took them this.**  
 11 **Q. You knew that Exhibit 6 didn't include the**  
 12 **cash payments, though, didn't you?**  
 13 **A. Yes.**  
 14 **Q. But you never told anyone at your tax preparer**  
 15 **about that?**  
 16 **A. No. Well, they also never asked me. This my**  
 17 **wife and I filled out together as far as our work that**  
 18 **we did there.**  
 19 **(Deposition Exhibit 7 marked.)**  
 20 **Q. (BY MR. MCCOMBER) I'm now going to hand you**  
 21 **Exhibit 7. Exhibit 7 is the payroll register for**  
 22 **Shan Namkeen for 2014. And this shows that starting in**  
 23 **January of 2014 that they were paying you \$8 an hour.**  
 24 **A. Yes.**  
 25 **Q. Is that true?**

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1 **A. Yes.**  
 2 **Q. And then if you go through Exhibit 7, it shows**  
 3 **\$8 per hour until June of 2014 when it increases to**  
 4 **\$9 per hour.**  
 5 **A. Yes.**  
 6 **Q. Is that when you asked for the raise from**  
 7 **Mr. Patel?**  
 8 **A. Well, that raise happened because one day I**  
 9 **was sick. And so I asked that Angel be put in the**  
 10 **position where I was, because I had a really bad cold**  
 11 **and I had to be bent over there. And so he tried to go**  
 12 **tell Angel that and his wife, but they didn't want to**  
 13 **do that, they didn't want to go there. So he told me,**  
 14 **"Stay there and I'll give you a dollar raise."**  
 15 **And so after that, then he left and his**  
 16 **wife came and his wife said, "Okay, stop doing that and**  
 17 **go home." And I stayed there even though I was sick**  
 18 **working the rest of my shift. I said, "No, I don't**  
 19 **want to leave. I want you to help me." And I stayed**  
 20 **there until the shift was over even though I was sick.**  
 21 **Q. And Ms. Patel, she said you could leave if you**  
 22 **wanted to, though, right?**  
 23 **A. Well, we never talked about my leaving. I**  
 24 **just asked for someone to come and help me. And he**  
 25 **tried to get someone to come and help me, but he wasn't**

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1 **able to get someone to take me over to my area to help**  
 2 **me. And so he said, "Okay, just stay here and I'll**  
 3 **give you that dollar raise." But I didn't ask for that**  
 4 **of him, he gave it to me.**  
 5 **Q. Did you appreciate it?**  
 6 **A. Of course.**  
 7 **Q. Were you mad at him for that whole situation?**  
 8 **A. No.**  
 9 **Q. Did you feel like you were mistreated at all**  
 10 **during that situation?**  
 11 **A. No.**  
 12 **Q. And, in fact, it shows in September 2014 you**  
 13 **got another raise to \$10 per hour; is that correct?**  
 14 **A. Yes.**  
 15 **Q. Did you ask for that raise?**  
 16 **A. Yes.**  
 17 **Q. Is that the one you were referring to earlier**  
 18 **where you asked Mr. Patel for the raise?**  
 19 **A. Yes, that's the last raise that I asked of**  
 20 **him.**  
 21 **Q. So is it your testimony that in 2014 even**  
 22 **though you received two raises during those years, up**  
 23 **to \$10 per hour, that you were still working on the**  
 24 **weekends for \$5 an hour for cash?**  
 25 **A. Well, I never did say that he was paying me**

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1 **\$5 an hour, I just received the money that he gave me.**  
 2 **I never added it up and I never said it was \$5 an hour.**  
 3 **Q. How much were you paid per hour in 2014 when**  
 4 **you worked for cash?**  
 5 **A. Well, I never did tally that up. As I said**  
 6 **before, and I'm going to repeat this, sometimes he**  
 7 **would give me 40, sometimes 50, sometimes 60.**  
 8 **Q. Putting aside overtime, do you think you**  
 9 **worked any hours in 2014 that you were not paid for?**  
 10 **A. No, he always paid me.**  
 11 **Q. But you believe you're owed some additional**  
 12 **overtime for the weeks you worked more than 40 hours,**  
 13 **correct?**  
 14 **A. Yes.**  
 15 **Q. But you can't tell me what that is?**  
 16 **A. No.**  
 17 **Q. What other employees have received cash**  
 18 **payments from Mr. Patel for working on the weekend?**  
 19 **A. Well, I just know about my wife. The rest of**  
 20 **them I don't know.**  
 21 **Q. So other than your wife, you don't have**  
 22 **personal knowledge of anyone else being paid in cash?**  
 23 **A. No, and that wasn't my business. I just did**  
 24 **my work.**  
 25 **Q. Did any employee ever tell you they were also**



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1 paid in cash?

2 **A. No, and I didn't ask that.**

3 Q. But you and other employees sometimes went to

4 work together and went home together, didn't you?

5 **A. Yes.**

6 Q. And you and other employees spent time

7 together working for shifts at Shan Namkeen.

8 **A. Yes.**

9 Q. And from 2013 to 2015 no employee at Shan

10 Namkeen ever told you they were paid in cash.

11 **A. Well, I didn't talk about things like that**

12 **with them.**

13 Q. And they never told you that either, did they?

14 **A. No.**

15 Q. So the only person as you sit here today that

16 you can testify under oath that received a cash payment

17 from Shan Namkeen is you and your wife?

18 **A. Well, yes, she would say, "Look, he gave me**

19 **this," and I would say, "Well, he gave me this."**

20 Q. But nobody else?

21 **A. No.**

22 Q. You said your children worked at Shan Namkeen.

23 Were they ever paid in cash?

24 **A. Always. He always gave them cash. They never**

25 **received a paycheck. Well, there's my daughter**

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1 **Victoria that worked there and then also Dimas, a child**

2 **I had with another lady, and he would work there on his**

3 **vacations. And he always was given \$40 a day cash.**

4 Q. Do you think Victoria was ever underpaid any

5 amount of money that she worked at Shan Namkeen?

6 **A. Well, no, he always paid them, but he always**

7 **paid them what he wanted to give them.**

8 Q. Do you believe Victoria is owed any money as

9 you sit here today by Shan Namkeen?

10 **A. No. No, it's okay.**

11 Q. As you sit here today is Dimas owed any money

12 by Shan Namkeen?

13 **A. No, they were happy. Even if they were given**

14 **\$10, you know, they're kids.**

15 Q. As you sit here today, do you believe your

16 wife is owed any money that she -- strike that.

17 As you sit here today, do you believe

18 your wife is owed any money by Shan Namkeen for hours

19 that she worked, but was not paid for?

20 **A. Well, that would be something that she would**

21 **have to figure out in her own time. I'm not really**

22 **getting into that, I'm just talking about my case.**

23 Q. Has she ever told you that she's owed money by

24 Shan Namkeen?

25 **A. Well, I can't really comment on her situation,**

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1 **all I can say is she worked more years for him than I**

2 **and her situation is even greater than mine, but I**

3 **can't really comment on it.**

4 MR. MCCOMBER: I'm going to object as

5 nonresponsive and move to strike that answer.

6 THE INTERPRETER: This is an interpreter

7 comment. The interpreter was just interpreting what

8 you said about that.

9 MR. MCCOMBER: Right.

10 **A. Well, you're asking me about my wife, but I'm**

11 **just telling you I really don't want to comment on her**

12 **situation.**

13 Q. (BY MR. MCCOMBER) Well, unless your lawyer

14 instructs you not to answer, you're going to have to.

15 **A. Okay.**

16 Q. And my question -- I'm going to rephrase it --

17 is pretty simple. It's really yes or no. Has your

18 wife ever told you she's owed money by Shan Namkeen?

19 **A. Yes.**

20 MR. PETERSEN: And I -- well, okay.

21 Q. (BY MR. MCCOMBER) When did she tell you that?

22 MR. PETERSEN: Okay. And, Counsel, I

23 think we're getting awfully -- or close to spousal

24 privilege. And her issue here, what we're talking

25 about, the particulars of --

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1 MR. MCCOMBER: I said when. Yeah, I'm

2 very clear with my questions.

3 MR. PETERSEN: Okay.

4 MR. MCCOMBER: And you have referenced

5 her in your pleadings, so I'm free to ask about it. So

6 if you think there's a privilege, then assert it, but

7 just -- I'm asking very specific questions.

8 MR. PETERSEN: Okay.

9 Q. (BY MR. MCCOMBER) Okay. So ready?

10 **A. Yeah, I'm ready.**

11 Q. When did he -- when did she tell you that?

12 **A. Well, she didn't just tell me one time, but**

13 **many times. And you-all will find that out in due**

14 **time, because really her case is bigger than mine.**

15 Q. You think she's going to file a lawsuit?

16 **A. I don't know.**

17 Q. Then why would you say that?

18 **A. Well, you're asking me if she's talked with me**

19 **and she's my wife and she trusts me.**

20 Q. Well, you're talking about a case and so are

21 you saying she's going to sue Shan Namkeen?

22 **A. I'm just saying that her case is larger than**

23 **mine, but I'm not saying she's going to sue anybody. I**

24 **don't know anything about that.**

25 Q. And this is another yes or no question. Do

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1 you know if she's talked to a lawyer about her  
 2 employment at Shan Namkeen?  
 3 **A. I don't know.**  
 4 **Q. So we talked about 2013 and '14, correct?**  
 5 **A. Yes.**  
 6 **Q. You signed your time sheets after you received**  
 7 **them, correct?**  
 8 **A. Yes.**  
 9 Q. And then you started receiving checks in 2014?  
 10 **A. Yes.**  
 11 Q. And you received those checks and your stub  
 12 reflecting the hours worked for that pay week.  
 13 **A. Yes.**  
 14 Q. And you never complained to Shan Namkeen that  
 15 any of those documents were incorrect?  
 16 **A. Well, I'm going to repeat that I told them two**  
 17 **or three times and he corrected that.**  
 18 Q. And so other than those two or three times  
 19 that were corrected you never spoke to Shan Namkeen  
 20 about any incorrect payment?  
 21 **A. No.**  
 22 Q. What was your last day of work at Shan  
 23 Namkeen?  
 24 **A. I don't remember the exact date, but it was**  
 25 **October 2015? 2014? No, 2015.**

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1 Q. So October of 2015 you quit at Shan Namkeen,  
 2 right?  
 3 **A. Well, yes, I left there because his wife was**  
 4 **very aggressive with me. I didn't want to argue with**  
 5 **her. And she was the type of woman that treated all of**  
 6 **us very badly.**  
 7 Q. You told me earlier that she didn't treat you  
 8 badly.  
 9 **A. Shailesh is a very good person, a special**  
 10 **person, but you never asked me about his wife.**  
 11 Q. When I referred to Mr. and Mrs. Patel being  
 12 generous with you earlier, that's what I was referring  
 13 to.  
 14 **A. Well, I never talked about money with that**  
 15 **lady, I only talked about money with him. Because if I**  
 16 **had talked to her about money, I don't think she would**  
 17 **have lent me any.**  
 18 Q. So is it fair to say that any conversations  
 19 you had while you were employed at Shan Namkeen about  
 20 money or hours all happened with Mr. Patel?  
 21 **A. Yes, with him or with his brother. I think**  
 22 **with his brother I spoke on a couple of occasions.**  
 23 Q. Did Ms. Patel ever set your schedule of when  
 24 you were supposed to work?  
 25 **A. Yes, and she was the one that would then punch**

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1 **us out at 4:00 o'clock when we were working and she**  
 2 **treated us badly. I talked with Shailesh two or three**  
 3 **times about that to ask him to talk to her and tell her**  
 4 **to treat us better, but she never did.**  
 5 MR. MCCOMBER: Objection, nonresponsive,  
 6 move to strike.  
 7 Q. (BY MR. MCCOMBER) Your last day of work, who  
 8 did you talk to about leaving the company?  
 9 **A. Well, when she started to be aggressive with**  
 10 **me, I just left. And I didn't even punch out, I just**  
 11 **left and went to my house.**  
 12 Q. How did you get your final check?  
 13 **A. Well, I think Shailesh took the check to my**  
 14 **wife at the laundromat and then she gave it to me.**  
 15 Q. I'm going to hand you Exhibit 8.  
 16 **A. Well, in fact, that check was not given to me,**  
 17 **because I owed him \$200 and so I still owed him some**  
 18 **money. That check didn't take care of all of that**  
 19 **amount. And so the amount that was still owed to him,**  
 20 **that was taken out of my wife's paycheck.**  
 21 MR. MCCOMBER: I'm going to object to the  
 22 nonresponsive portion of that answer.  
 23 Q. (BY MR. MCCOMBER) Do you recognize Exhibit 8?  
 24 **A. Yes.**  
 25 Q. Is that your signature on Exhibit 8, page 2?

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1 **A. Yes.**  
 2 Q. And you said earlier -- strike that.  
 3 **You testified earlier that when you sign**  
 4 **something you're agreeing that you understand it,**  
 5 **right?**  
 6 **A. Yes.**  
 7 **Q. And you signed Exhibit 8?**  
 8 **A. Yes.**  
 9 Q. And then the fourth paragraph of Exhibit 8 --  
 10 THE INTERPRETER: May I ask counsel to  
 11 point it out? Thank you.  
 12 Q. (BY MR. MCCOMBER) It says, "I have been paid  
 13 in full for all hours worked by me since the inception  
 14 of my employment with Shan Namkeen, Inc." And it says,  
 15 "I have no wage an hour, minimum wage, overtime wage or  
 16 any other claims whatsoever against Shan Namkeen, Inc."  
 17 And so you understood by signing this you  
 18 were agreeing that you don't have any of the claims  
 19 that you're asserting in this lawsuit.  
 20 MR. PETERSEN: And I'll object that it  
 21 calls for a legal conclusion. You can answer.  
 22 **A. Well, as far as this, I can't really tell you**  
 23 **much, because after I left I never talked with them**  
 24 **again. I never signed anything with them.**  
 25 Q. (BY MR. MCCOMBER) You signed Exhibit 8,

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1 right?

2 **A. Well, this paper, does this have to do with**

3 **when I was resigning from the company or what is this**

4 **about?**

5 MR. MCCOMBER: I'm going to object as

6 nonresponsive.

7 Q. (BY MR. MCCOMBER) My question is, you signed

8 Exhibit 8.

9 **A. Well, it's my signature, but I don't really**

10 **understand what that is.**

11 Q. Well, your signature means you agree to what

12 you signed. You said that earlier.

13 **A. Okay.**

14 Q. Did someone else sign your name to this

15 document?

16 **A. Well, from what I understand is this document**

17 **after I resigned -- well, this was taken to my house**

18 **and they asked me to sign this so that I would just**

19 **stop this case.**

20 Q. Well -- so you signed this document at your

21 home, correct?

22 **A. There are more documents like this and they**

23 **were speaking to my wife about them. And since my wife**

24 **doesn't understand English very well they had a**

25 **son-in-law of mine there to interpret. So that they**

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1 **could convince me to not go through with this case, for**

2 **me to just resign from this case and not to do it.**

3 **They made three different documents like this. They**

4 **made them up and I did sign them. That's the truth.**

5 Q. Well, I'm going to get to all those documents,

6 don't worry.

7 **A. Okay.**

8 **Q. But the first one I want to talk about is**

9 **dated October 9th, 2015, which is Exhibit 8, and that's**

10 **what you signed.**

11 **A. Okay. Okay. Yes, it's my signature.**

12 Q. And you signed this at your home?

13 **A. I signed it at a job that I had at Sea Cross.**

14 **My wife arrived there -- my wife arrived there, my**

15 **son-in-law and then a brother of Shailesh. And so they**

16 **called me and had me sign this, and so they were trying**

17 **to convince me to sign this document.**

18 Q. And you agreed to do it?

19 **A. I just signed it because my wife was asking**

20 **for me to sign it, because they were always talking to**

21 **my wife about this and telling her to tell me not to do**

22 **this.**

23 **Q. So the point is you signed it.**

24 **A. Yes.**

25 **Q. And you had your son-in-law there who you**

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1 **could ask questions if you had difficulty reading it,**

2 **correct?**

3 **A. Yes.**

4 **Q. And by signing it you agree you understood**

5 **what you were signing?**

6 **A. Yes.**

7 Q. And it means that you don't have any claims

8 for unpaid wages against Shan Namkeen based on this

9 agreement?

10 MR. PETERSEN: Objection, calls for a

11 legal conclusion. You can answer.

12 **A. Well, let's see. Let's see if this is legal**

13 **or not. Well, this document -- well, it's okay.**

14 Q. (BY MR. MCCOMBER) It says on Exhibit 8 that

15 you would get a hundred dollars. Do you know if that

16 hundred dollars was credited against what you owed Shan

17 Namkeen for your loan?

18 **A. Well, I owed them some money that I was not**

19 **able to pay off completely with that last paycheck and**

20 **so it was still owed to him. That was taken out of my**

21 **wife's check, that that debt would be paid up.**

22 Q. If Shan Namkeen's records reflect that a

23 hundred dollars was credited to the amount you were

24 loaned after this agreement, do you have any reason to

25 dispute that?

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1 **A. No. Well, he lent me the money and I repaid**

2 **it and thank you.**

3 Q. With respect to this document, it also says

4 Shan Namkeen would give you a reference -- a good

5 reference to future employers.

6 **A. Well, I haven't used that at all.**

7 Q. Do you think they would do that if asked?

8 **A. Well, I don't know. I haven't used that and I**

9 **haven't asked them for that. I have a good job now and**

10 **I never even mentioned that I worked for them.**

11 Q. Are you aware in any way of Shan Namkeen not

12 fulfilling their obligations under Exhibit 8?

13 **A. I'm sorry?**

14 Q. Has Shan Namkeen done what it's supposed to do

15 under this Exhibit 8?

16 **A. I don't know.**

17 Q. Were you forced to sign Exhibit 8 by anyone at

18 Shan Namkeen?

19 **A. Well, during about two weeks I didn't want to**

20 **sign this document, but they were being very demanding**

21 **with my wife and getting her to try to get me to sign**

22 **this document.**

23 Q. This document was signed your last day of work

24 at Shan Namkeen.

25 **A. That's a lie. That's not true. I left that**

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1 **company and I never returned and I never have returned.**  
 2 Q. How do we know that date is incorrect?  
 3 **A. I'm just telling you what I told you before.**  
 4 **I left that company because of what happened. I never**  
 5 **returned to sign any documents.**  
 6 Q. So you signed Exhibit 8 sometime later and at  
 7 your new job.  
 8 **A. Like three or four weeks later I signed. This**  
 9 **is not my handwriting. They put these dates on there**  
 10 **when they wanted to. This is my handwriting, but not**  
 11 **this. They later put those dates whenever they wanted**  
 12 **to.**  
 13 Q. Your testimony today under oath is you  
 14 remember signing Exhibit 8 and the date being blank?  
 15 **A. That's what it was, blank, and I just signed**  
 16 **it.**  
 17 Q. When you signed Exhibit 8, had you already  
 18 filed a lawsuit against my client?  
 19 **A. Yes. Well, the day that I left, the next day**  
 20 **I came here.**  
 21 Q. Why didn't you show Exhibit 8 to your lawyers?  
 22 **A. Well, when they gave it to me I did bring it**  
 23 **and I showed it to them. When I had it in my hand,**  
 24 **then I came and showed it to them.**  
 25 Q. Before you signed it?

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1 **A. No, already signed.**  
 2 Q. Did anyone at Shan Namkeen threaten you in any  
 3 way and make you sign Exhibit 8?  
 4 **A. Well, I never talked with them about anything.**  
 5 **I don't know why they enthused my wife so much, I don't**  
 6 **know what they might have told her, but I never talked**  
 7 **to them about anything.**  
 8 Q. So since you didn't talk to anyone at Shan  
 9 Namkeen about signing Exhibit 8, they clearly didn't  
 10 threaten you personally in any way.  
 11 **A. No, they never threatened me.**  
 12 Q. Are you testifying today that anyone at Shan  
 13 Namkeen threatened your wife in any way to get you to  
 14 sign Exhibit 8?  
 15 **A. Well, no, not -- not -- no, that's really an**  
 16 **incorrect word. I'm not saying that they ever**  
 17 **threatened. I'm not saying that they threatened**  
 18 **anybody. This is a word that's not correct. I'm just**  
 19 **saying that they spoke with her, but I'm not saying**  
 20 **that they ever threatened her.**  
 21 Q. Okay. You could have taken Exhibit 8 to your  
 22 lawyer before you signed it, couldn't you?  
 23 **A. I didn't bring them to them, because there are**  
 24 **three documents. This is one of three documents. The**  
 25 **next one, I signed it to authorize the fact that I was**

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1 **going to take them off the case, saying that I didn't**  
 2 **need them anymore. That they could come to some**  
 3 **agreement with them and that I wasn't going to have to**  
 4 **be involved anymore. So all of that was happening when**  
 5 **they were telling me these things. And so that's why I**  
 6 **didn't bring them the documents.**  
 7 **The last thing that happened, my wife**  
 8 **asked for a document from them at the very end, that**  
 9 **this case was a pretty complicated one and that they**  
 10 **take responsibility for this. And so the third**  
 11 **document, I think, was signed by him, by me, my wife**  
 12 **and I think his brother.**  
 13 **And so that third document is saying that**  
 14 **they're going to take responsibility for this**  
 15 **complicated situation. And that the company was**  
 16 **agreeing to pay me what they needed to pay me so that**  
 17 **nothing would happen to me. But all of these documents**  
 18 **they drew up, I just signed them.**  
 19 MR. MCCOMBER: I'm going to object as  
 20 nonresponsive.  
 21 Q. (BY MR. MCCOMBER) And I have a lot of  
 22 questions about what you asked, but I don't think it  
 23 was responsive to my questions.  
 24 You could have taken Exhibit 8 to your  
 25 lawyer before you signed it.

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1 **A. Yes. Yes. And I didn't do it.**  
 2 Q. Okay.  
 3 MR. MCCOMBER: Let's go ahead and take a  
 4 lunch break.  
 5 (Recess taken.)  
 6 Q. (BY MR. MCCOMBER) Mr. Rodriguez, before we  
 7 took a break we were talking about your employment at  
 8 Shan Namkeen. I'd like to ask you a few more questions  
 9 about some of the things we talked about this morning.  
 10 Now, you indicated that there were days  
 11 on the weekends that you worked at Shan Namkeen where  
 12 you were paid in cash, correct?  
 13 **A. Yes.**  
 14 **Q. Now, was it mostly on Saturdays or was it**  
 15 **Saturdays and Sundays or can you give us a better idea**  
 16 **of how often a month you would work these shifts on the**  
 17 **weekend?**  
 18 **A. Only on Saturdays and Sundays they paid me**  
 19 **cash.**  
 20 **Q. And was it -- did you work on mostly Saturdays**  
 21 **or mostly on Sundays?**  
 22 **A. Well, sometimes both days, sometimes just one**  
 23 **of those days.**  
 24 Q. And so when you told me earlier that you would  
 25 work three to four times per month, is that three to

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1 four days per month or three to four weekends being  
 2 both Saturday and Sunday?  
 3 **A. Five or six days per month.**  
 4 Q. And those days might be Saturdays and Sundays?  
 5 **A. Yes.**  
 6 Q. And was this consistent throughout your time  
 7 at Shan Namkeen?  
 8 **A. Yes.**  
 9 Q. And so when you worked -- starting with 2013,  
 10 when you worked weekend shifts, either Saturday or  
 11 Sunday in 2013, who were the employees that worked with  
 12 you?  
 13 **A. Well, it was Maritsa and Angel. Well, that's**  
 14 **what we called her, Maritsa. It was Mr. Patel's wife.**  
 15 **And Angel, my wife and I and Shailesh's brother.**  
 16 **Shailesh sometimes was with us, but it wasn't a sure**  
 17 **thing. Sometimes he would just come and load up and**  
 18 **then he would leave.**  
 19 Q. And so the typical group was Angel, correct?  
 20 **A. Yes.**  
 21 Q. Ms. Patel?  
 22 **A. Yes.**  
 23 Q. Ana, your wife?  
 24 **A. Yes.**  
 25 Q. You?

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1 **A. Yes.**  
 2 Q. And who were the others that completed that  
 3 shift?  
 4 **A. Well, it was for sure us. Sometimes there**  
 5 **might be one other employee. But we would just do what**  
 6 **we were able to do.**  
 7 Q. And who were the other employees that would  
 8 help from time to time on these weekend shifts?  
 9 **A. Fabiola. Well, it would be mainly her.**  
 10 **Sometimes there would be some other people, but there**  
 11 **was a lot of turnover. Some would come and go.**  
 12 Q. What about Amelia?  
 13 **A. Amelia worked there for just a short period of**  
 14 **time while I was there. When I started to work there**  
 15 **Amelia left.**  
 16 Q. And she -- so she never worked on a weekend  
 17 with you?  
 18 **A. Yes, she did arrive there.**  
 19 Q. Did she ever work you on a weekend after you  
 20 started working there?  
 21 **A. Yes.**  
 22 Q. And she -- so every now and again she would  
 23 still work a shift?  
 24 **A. Well, she did work her shift from Monday to**  
 25 **Thursday, Monday to Friday, Monday to Wednesday. And**

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1 **when they needed her she would also go on Saturday.**  
 2 Q. So when you worked Saturdays in 2013 -- strike  
 3 that.  
 4 When you worked Saturdays or Sundays in  
 5 2013 where you were paid cash, you would have worked  
 6 with Angel, Ms. Patel, Ana, Fabiola, Amelia most  
 7 likely.  
 8 **A. Yes, but not always. It wasn't always a sure**  
 9 **thing that we all were going to be there. Sometimes he**  
 10 **might just call three people in. It depended on what**  
 11 **he wanted to produce.**  
 12 Q. Was there anyone else other than these people  
 13 that we just mentioned that worked with you on either a  
 14 Saturday or a Sunday?  
 15 **A. Well, no, and I really don't remember, because**  
 16 **there were some people that would just come and work**  
 17 **for a week or two and then they'd leave and I don't**  
 18 **really remember them.**  
 19 Q. And are these the same people that worked with  
 20 you in 2013 through 2015 on Saturdays and Sundays?  
 21 **A. A lot of them are not there any longer. For**  
 22 **example, Amelia, she practically left when I started to**  
 23 **work there.**  
 24 Q. With respect to -- strike that.  
 25 I don't understand how Amelia could have

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1 left when you started to work, but she still worked  
 2 with you on the weekends. Can you explain that?  
 3 **A. Well, when I started to work there she would**  
 4 **go to work on Saturdays, but then shortly after I**  
 5 **started to work there she stopped working there and**  
 6 **didn't go to work there any longer.**  
 7 Q. And so were you able to run a shift with just  
 8 you, Angel, Ms. Patel, Ana and Fabiola?  
 9 **A. Yes, and Fabiola wasn't used that much. For**  
 10 **sure I would go, my wife and Angel.**  
 11 Q. And so Angel was always there when you guys  
 12 worked on the weekends?  
 13 **A. Yes, he was always there.**  
 14 Q. And this is true from 2013 through 2015?  
 15 **A. It was the same thing always.**  
 16 Q. Now, when you went to work at Shan Namkeen,  
 17 did the employees that you worked with, did y'all  
 18 carpool together to work?  
 19 **A. No, different vehicles. Well, I had a vehicle**  
 20 **and Angel did.**  
 21 Q. Did anyone ride with you to and from work from  
 22 Shan Namkeen?  
 23 **A. Fabiola always went with me.**  
 24 Q. And is that true for when you worked on  
 25 Saturdays and Sundays?



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1 **A. Yes. Yes, she didn't drive. I always took**  
 2 **her.**  
 3 Q. When you worked on Saturdays and Sundays from  
 4 2013 to 2015, was your wife Ana always with you for  
 5 those shifts?  
 6 **A. Yes.**  
 7 Q. Did you ever work on a weekend without Ana or  
 8 Angel?  
 9 **A. Yes, but almost always with them.**  
 10 Q. Do you know the dough recipe for the products  
 11 at Shan Namkeen?  
 12 **A. One part of it, but not all of it.**  
 13 Q. So you would need someone to work with you  
 14 whenever you ran a shift that would know how to mix the  
 15 dough, correct?  
 16 **A. Yes.**  
 17 **(Deposition Exhibit 9 marked.)**  
 18 Q. (BY MR. MCCOMBER) Now, I'm going to hand you  
 19 what has been marked Exhibit 9. Exhibit 9 is the time  
 20 employee -- strike that.  
 21 Exhibit 9 is the employee time detail for  
 22 2015. And are these the documents that would print out  
 23 from the computer that kept the time that you logged in  
 24 and out of and that you would sign?  
 25 **A. Yes.**

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1 Q. And it's your signature on the pages of  
 2 Exhibit 9?  
 3 **A. Yes.**  
 4 Q. And did you ever speak with someone -- you  
 5 indicated -- strike that.  
 6 You indicated earlier there were three  
 7 occasions when you talked to Mr. Patel about your check  
 8 being incorrect.  
 9 **A. Yes.**  
 10 Q. Do you know if it was during 2015 for any of  
 11 these records?  
 12 **A. Well, I don't remember if it was 2014 or 2015.**  
 13 **It happened many times, but it didn't happen**  
 14 **frequently.**  
 15 Q. And in any event -- so other than those  
 16 instances you never talked to Mr. Patel or anyone at  
 17 Shan Namkeen that these numbers in Exhibit 9 were  
 18 incorrect?  
 19 **A. No.**  
 20 **(Deposition Exhibit 10 marked.)**  
 21 Q. (BY MR. MCCOMBER) I'm going to hand you  
 22 what's been marked Exhibit 10. Does Exhibit 10 contain  
 23 the payment stubs you received with your paycheck in  
 24 2015 from Shan Namkeen?  
 25 **A. Yes.**

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1 Q. Other than the three times that you spoke with  
 2 Mr. Patel regarding inconsistencies with your pay, did  
 3 you talk with anyone at Shan Namkeen indicating that  
 4 these check stubs or your payment was incorrect as  
 5 reflected in Exhibit 10?  
 6 **A. No.**  
 7 Q. And looking at Exhibit 10 in the bottom  
 8 right-hand corner, which is PL Docs 30.  
 9 THE INTERPRETER: On the third page?  
 10 MR. MCCOMBER: 30.  
 11 Q. (BY MR. MCCOMBER) Do you see on this page of  
 12 Exhibit Number 10 that it's your pay period ending  
 13 July 10th, 2015?  
 14 **A. It -- well, it was over in July, right?**  
 15 Q. Yeah, July 10th, 2015.  
 16 THE INTERPRETER: The interpreter  
 17 misinterpreted. The interpreter said June and not  
 18 July.  
 19 MR. MCCOMBER: Thank you.  
 20 Q. (BY MR. MCCOMBER) Do you see that?  
 21 **A. Yes, I see it.**  
 22 Q. Do you see where you're paid for five hours of  
 23 overtime on that check?  
 24 **A. Yes.**  
 25 Q. And you were paid time and a half for those

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1 overtime hours?  
 2 **A. Yes.**  
 3 THE INTERPRETER: Interpreter comment.  
 4 The interpreter wanted to see where that was so he  
 5 could focus.  
 6 MR. MCCOMBER: It's in the top right-hand  
 7 corner.  
 8 THE INTERPRETER: Thank you.  
 9 Q. (BY MR. MCCOMBER) And was this the time when  
 10 you said Mr. Patel was out of town?  
 11 **A. Yes.**  
 12 Q. And looking again at the next page, PL Docs  
 13 37, do you see on this page for the week ending July 17  
 14 there was an advance of \$300 on that check?  
 15 **A. Perhaps that was one of the loans that he gave**  
 16 **me.**  
 17 Q. And then year to date it looks at that point  
 18 in time you had received a loan of \$950 as of that  
 19 date. Do you see that?  
 20 **A. Yes.**  
 21 Q. And why are you making a distinction between  
 22 an advance and a loan?  
 23 **A. Well, they weren't advances. What he would**  
 24 **lend to me he would take out of my check every week.**  
 25 **If I'm asking for a loan, then I don't have any extra**

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1 **money to pay any advances.**  
 2 Q. Well, for example, I guess in my mind a loan  
 3 means that you're borrowing money and paying interest,  
 4 and an advance seems to be you're getting paid before  
 5 you actually work for time that you're going to work.  
 6 **A. Yes.**  
 7 Q. Now, earlier we talked about the loans or  
 8 advances you received from Shan Namkeen. My records  
 9 reflect that in June -- strike that.  
 10 My records reflect that in January of  
 11 2014 you were given a loan or advance of a thousand  
 12 dollars.  
 13 **A. It was money that was lent.**  
 14 Q. And what was the purpose of that thousand  
 15 dollar loan?  
 16 **A. Well, my father at that time was sick and he**  
 17 **died, and so he was offering me some property to buy,**  
 18 **and so that's the money that I used so I could have**  
 19 **enough to buy that property.**  
 20 Q. And were you grateful that Mr. Patel and  
 21 Mrs. Patel were willing to do that?  
 22 **A. Yes.**  
 23 Q. And then in March 2014 it appears you borrowed  
 24 another \$1,400, and then in June another \$100, and then  
 25 in October another \$500. Do you agree with that?

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1 **A. Yes.**  
 2 Q. And then in January of 2015 you got another  
 3 \$500 loan?  
 4 **A. Yes.**  
 5 Q. And then in May of 2015 you got another \$1,200  
 6 loan?  
 7 **A. Yes.**  
 8 Q. And then in September 2015 you got an advance  
 9 of another \$200.  
 10 **A. Yes.**  
 11 Q. And what day did you decide that you were  
 12 going to quit coming back to work at Shan Namkeen?  
 13 **A. No, I always wanted to work there. I was**  
 14 **happy working there. I liked it.**  
 15 Q. Then why did you quit?  
 16 **A. Well, I'm going to tell you one more time.**  
 17 **The lady accosted me and I don't like to be accosted**  
 18 **and so I decided to leave.**  
 19 Q. You were accosted?  
 20 **A. Yes.**  
 21 Q. What does that mean?  
 22 **A. Well, accosted me -- well, annoying me, using**  
 23 **aggressive words.**  
 24 Q. Did she touch you?  
 25 **A. No.**

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1 Q. Did she threaten you physically?  
 2 **A. No, just verbally.**  
 3 Q. Did she use curse words to you?  
 4 **A. Well, not real bad, but yes.**  
 5 Q. What did she say?  
 6 **A. Well, the problem was -- well, it had to do**  
 7 **with a machine. And there was a new person working on**  
 8 **that machine. And so when you turn that machine on and**  
 9 **before it warms up, the dough will stick to it. And so**  
 10 **he didn't know what to do.**  
 11 **And so I was on one side, she was on the**  
 12 **other. And so she asked me why the machine was doing**  
 13 **that, and I said, "I don't know. Well, you know." And**  
 14 **so I said, "Well, you know what you're doing." And she**  
 15 **goes -- so she said, "Okay. Well, if you don't know**  
 16 **what this is about, then shut up and go do the work**  
 17 **that you do know how to do." And so there was an exit**  
 18 **door and when she told me that, well, I just decided to**  
 19 **leave.**  
 20 Q. Did this conversation happen in English?  
 21 **A. No, she speaks a lot of Spanish.**  
 22 Q. So your testimony is she spoke to you in  
 23 Spanish?  
 24 **A. Well, she mixes up three languages, the Indian**  
 25 **language, English and Spanish, and, you know, you're**

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1 **able to understand one of those words.**  
 2 Q. So the records in Exhibit 9 reflect your last  
 3 day of work was October 9th, 2015.  
 4 **A. I think so, yes.**  
 5 Q. And you believe that's the right day?  
 6 **A. Well, yes. Perhaps, yes.**  
 7 Q. Had you ever considered quitting before that  
 8 day?  
 9 **A. No.**  
 10 Q. So that one conversation caused you to give up  
 11 a job that you've had for three years?  
 12 **A. Well, I was really tired. She had harassed me**  
 13 **many times before that and I was just fed up.**  
 14 Q. And in 2015 you had just asked for another  
 15 loan of \$400 seven days before that, on October 2nd,  
 16 2015.  
 17 **A. I think so.**  
 18 Q. And so you prior to walking out and getting  
 19 your last check still owed Shan Namkeen \$500?  
 20 **A. Yes. I don't remember the amount, but I did**  
 21 **owe him.**  
 22 Q. And then your last check was \$240.11, which  
 23 went to that balance.  
 24 **A. Yes.**  
 25 Q. And after the application of the hundred

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1 dollar credit you received for signing Exhibit 8, Shan  
 2 Namkeen's records show that you still owe them \$159.89.  
 3 **A. Perhaps so. And then that money was given to**  
 4 **him through my wife's check.**  
 5 MR. MCCOMBER: I'm going to object to the  
 6 nonresponsive part of that answer.  
 7 Q. (BY MR. MCCOMBER) Your wife Ana also received  
 8 from her employer loans as well, correct?  
 9 **A. Well, those loans were for both of us, and so**  
 10 **when we would ask for those loans, then sometimes they**  
 11 **would take half of the money out of her pay and half of**  
 12 **the money out of mine to pay back those loans.**  
 13 Q. Did you ever -- strike that.  
 14 As you sit here today, have you ever gone  
 15 back to see if all the money you were loaned has been  
 16 paid back?  
 17 **A. Yes, and I had in my mind what I owed and then**  
 18 **I was told what was still owed. "Well, that was taken**  
 19 **out of your wife's check."**  
 20 Q. Who told you that?  
 21 **A. My wife. She said, "Well, they took out of my**  
 22 **check what you still owed them."**  
 23 Q. Do you know if that's true or not?  
 24 **A. Yes, of course, I believe her.**  
 25 Q. But you haven't done anything on your own to

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1 confirm whether that is true or not.  
 2 **A. No. Well, my wife still ought to have a check**  
 3 **stub.**  
 4 **(Deposition Exhibit 11 marked.)**  
 5 Q. (BY MR. MCCOMBER) I'm going to hand you  
 6 Exhibit 11. At the end of 2015 you received a W-2 from  
 7 Shan Namkeen, correct?  
 8 **A. Yes.**  
 9 Q. Did you ever tell anyone at Shan Namkeen that  
 10 this was incorrect, because it did not include cash  
 11 payments you received working on Saturdays and Sundays?  
 12 **A. No.**  
 13 Q. Do you know how much you made total in 2015  
 14 when you add in the cash payments?  
 15 **A. I'm not sure.**  
 16 Q. And you've never tried to make that  
 17 calculation?  
 18 **A. No.**  
 19 **(Deposition Exhibit 12 marked.)**  
 20 Q. (BY MR. MCCOMBER) I'm going to hand you  
 21 what's been marked Exhibit 12. On Exhibit 12 this is  
 22 the payroll register for 2015, which shows the payments  
 23 made to you by Shan Namkeen. Do you see that?  
 24 **A. Yes.**  
 25 Q. And you see how their records reflect that you

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1 were paid \$10 an hour for the entirety of 2015?  
 2 **A. Yes.**  
 3 Q. Is that correct?  
 4 **A. Well, as far as they're paying me that, they**  
 5 **paid me that. But I don't remember when they started**  
 6 **to pay me that.**  
 7 **Q. Are you able to identify any week in 2015 that**  
 8 **you believe you specifically worked over 40 hours, but**  
 9 **were not paid overtime?**  
 10 **A. Well, I don't really know exactly, but as far**  
 11 **as my having worked them -- those hours, I did work**  
 12 **them.**  
 13 **Q. But you can't tell me the specific week in**  
 14 **2015 that you worked more than 40 hours, but were not**  
 15 **paid overtime, can you?**  
 16 **A. No.**  
 17 **Q. And you can't tell me a specific day in 2015**  
 18 **that you believe you made a delivery and you were not**  
 19 **paid for that time, can you?**  
 20 **A. No.**  
 21 Q. And you can't tell me a specific day in 2015  
 22 when you believe you worked after you were clocked out  
 23 at 4:00 o'clock and were unpaid for that time, can you?  
 24 **A. Yes.**  
 25 Q. And the same is true for 2014 and 2013?

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1 **A. Yes.**  
 2 **(Deposition Exhibit 13 marked.)**  
 3 Q. (BY MR. MCCOMBER) I'm now going to hand you  
 4 what's marked Exhibit 13. Your last day of work was  
 5 October 9th, 2015.  
 6 **A. Yes.**  
 7 Q. And Exhibit 13 was the lawsuit you filed  
 8 against my clients on October 19th, 2015. Do you see  
 9 that?  
 10 **A. Yes.**  
 11 Q. Did you read and approve of your lawyer filing  
 12 Exhibit 13?  
 13 **A. Yes.**  
 14 Q. Don't tell me what you said to your lawyer.  
 15 My question is simply prior to October 9th, 2015, your  
 16 last day at work, had you spoken with a lawyer at all  
 17 about this case?  
 18 **A. No.**  
 19 Q. Is it your testimony that the first day you  
 20 spoke with a lawyer was October 10th, 2015, the day  
 21 after you quit work?  
 22 **A. Well, possibly. I don't remember exactly the**  
 23 **day. I did it as soon as possible. I think the first**  
 24 **time I came here they were not here, but I did do it as**  
 25 **soon as possible after quitting here.**

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1 Q. And so you're referring to the law office  
2 we're here at today?  
3 **A. Yes.**  
4 Q. And without telling me any communications you  
5 had with any lawyer, how did you get the name of this  
6 law firm to contact?  
7 **A. Fabiola gave it to me.**  
8 Q. Did she say anything to you about using these  
9 lawyers?  
10 **A. No, she just gave me one of their business**  
11 **cards.**  
12 Q. Do you know where she got that?  
13 **A. No.**  
14 Q. Do you know if she ever hired the law firm for  
15 anything?  
16 **A. Well, she had a friend that had had a similar**  
17 **case here and they represented him.**  
18 Q. Was it anything related to Shan Namkeen?  
19 **A. Yes.**  
20 Q. Who was that friend?  
21 **A. I don't know. Fabiola just told me, but I**  
22 **don't know his name.**  
23 Q. But it was a male?  
24 **A. Yes.**  
25 Q. Have you ever talked to that person?

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1 **A. No, I've just seen him one time and I just saw**  
2 **him. I don't even know who he is.**  
3 **(Deposition Exhibit 14 marked.)**  
4 **Q. (BY MR. MCCOMBER) I'm going to hand you**  
5 **Exhibit 14. Is that your signature on Exhibit 14?**  
6 **A. Yes.**  
7 **Q. And that's a letter dated February 5th, 2016**  
8 **to your attorney?**  
9 **A. Yes.**  
10 Q. And this letter was also sent to Shan Namkeen,  
11 correct?  
12 **A. To whom did I send it?**  
13 Q. To Shan Namkeen. Look at the second page.  
14 **A. Well, I didn't send it to him.**  
15 Q. Did you put this letter in the mailbox,  
16 Exhibit 14?  
17 **A. He put it in there.**  
18 MR. MCCOMBER: I'm going to object as  
19 nonresponsive, move to strike.  
20 Q. (BY MR. MCCOMBER) Did you put Exhibit 14 in  
21 the mailbox?  
22 **A. No.**  
23 Q. Who did you give it to after you signed it?  
24 **A. To my daughter and to my son-in-law and also**  
25 **to my wife.**

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1 Q. And you signed it and told them to mail it?  
2 **A. No.**  
3 Q. Why did you sign it when you know that that  
4 means you agree to it?  
5 **A. Well, no -- well, no. These letters -- well,**  
6 **I don't know anything. I just signed them. Well, I**  
7 **signed them, but there are a lot of things about these**  
8 **letters that don't really have to do with us. They**  
9 **made them up. And they were the ones that signed it,**  
10 **my daughter, my brother-in-law. He and his brother**  
11 **went to mail it.**  
12 **Q. You signed it, though, right?**  
13 **A. Yes.**  
14 Q. Explain to me why you keep sending things and  
15 signing documents that say you don't want -- you don't  
16 have any claims against my clients?  
17 **A. Well, because he was talking with my daughter**  
18 **and my wife and my son-in-law and they were telling me**  
19 **to drop this.**  
20 Q. Why didn't you just drop it?  
21 **A. Well, I think my wife was convinced by him,**  
22 **because she had a good friendship with him, and so I**  
23 **think that's why.**  
24 MR. MCCOMBER: Objection, nonresponsive.  
25 Q. (BY MR. MCCOMBER) Why didn't you just drop

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1 the case if that's what you wanted to do in Exhibit 14?  
2 **A. Well, I didn't do it.**  
3 Q. And you're telling your lawyer in Exhibit 14  
4 to drop this case, that you don't want to file it.  
5 **A. Well, I didn't tell them that, I just brought**  
6 **the proof of the things that they gave me.**  
7 Q. And you also put in this letter that you  
8 thought about the case and realized that you were paid  
9 in full and weren't owed any money, right?  
10 **A. No.**  
11 Q. So your signature doesn't mean anything?  
12 **A. It's just my signature.**  
13 Q. I told you earlier that when you sign  
14 something in Texas it means you understand it and you  
15 agree to it. And you agreed with that.  
16 **A. Yes.**  
17 Q. And you agree with that, right?  
18 **A. Well, that I signed it, yes, but I'm not in**  
19 **agreement that I made out this letter.**  
20 Q. But that language was already in the letter  
21 before you signed it, wasn't it?  
22 **A. Yes.**  
23 Q. And you had your son-in-law there if you had  
24 any questions about what that letter said, didn't you?  
25 **A. Well, he read to me what was on there and I**

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1 signed it.

2 Q. Do you know who dropped it in the mailbox?

3 **A. Well, it was the four of them, my daughter, my**

4 **son-in-law, he and his brother.**

5 Q. Well, if your whole family doesn't want you

6 filing this lawsuit because they think you were paid

7 everything you were entitled to get from Shan Namkeen,

8 why do you feel differently?

9 MR. PETERSEN: Objection, misstates the

10 record. You can answer.

11 **A. Well, after seeing all of this, I saw that it**

12 **wasn't correct.**

13 Q. (BY MR. MCCOMBER) What are you referring to?

14 **A. After seeing all of this paperwork. That's**

15 **why I went to them to see if they could help me.**

16 Q. Well, what you told me today is we looked

17 through all the paperwork on this table and nothing in

18 there supports the fact that you worked on any day,

19 either Saturday or Sunday.

20 **A. Yes.**

21 Q. Do you have any document that you looked at

22 that convinced you that you're owed money from

23 Shan Namkeen?

24 **A. No.**

25 **(Deposition Exhibits 15-16 marked.)**

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1 Q. (BY MR. MCCOMBER) I'm going to hand you

2 Exhibit 15 and Exhibit 16.

3 MR. MCCOMBER: And then do you have

4 Exhibit 11?

5 THE INTERPRETER: Yes.

6 Q. (BY MR. MCCOMBER) So Exhibit 11 is your W-2

7 from Shan Namkeen for 2015, correct?

8 THE INTERPRETER: The year again,

9 Counsel?

10 MR. MCCOMBER: 2015.

11 **A. Yes.**

12 Q. (BY MR. MCCOMBER) And that year from Shan

13 Namkeen, they reported your income as \$13,535, correct?

14 **A. Yes.**

15 Q. Which did not include any cash payments,

16 correct?

17 **A. No, it didn't.**

18 Q. And then if you look at Exhibit Number 15,

19 this is the W-2 for your wife's employment at

20 S-2 Brothers, correct?

21 **A. I don't know. I don't know about her. I know**

22 **about mine.**

23 Q. Well, do you agree with me that Exhibit 15,

24 which was produced by you in this lawsuit, shows that

25 she was paid \$15,080 by S-2 Brothers in 2015?

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1 **A. I don't know.**

2 Q. Can you read that number on Exhibit 15?

3 **A. Yes, but this is her paperwork, not mine. I**

4 **don't have any reason to be going into her paperwork.**

5 Q. Well, sir, then why did you produce that as

6 part of this lawsuit?

7 **A. This?**

8 Q. Yes.

9 **A. Well, perhaps it was among my papers, but I**

10 **don't have any reason to have done that.**

11 Q. Do you have any reason as you sit here

12 today -- strike that.

13 Do you have any reason as you sit here

14 today to dispute that your wife was paid \$15,080 in

15 2015 from S-2 Brothers?

16 **A. No.**

17 Q. Looking at Exhibit 16, is this the 2015

18 W-2 you received from Johnston Temporary Services?

19 **A. I think so.**

20 Q. And they paid you \$1,092.95?

21 **A. Yes.**

22 **Q. And so looking at Exhibit 11, 15 and 16, the**

23 **total amount of money reflected paid to you and your**

24 **wife in 2015 is \$29,708.**

25 **A. Well, yes, there it is.**

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1 **Q. And do you have any reason to dispute that's**

2 **what the W-2 income you and your wife received for**

3 **2015?**

4 **A. No.**

5 **Q. And that amount does not include any cash**

6 **payments made to either you or your wife from Shan**

7 **Namkeen, does it?**

8 **A. No, it doesn't.**

9 **(Deposition Exhibit 17 marked.)**

10 **Q. (BY MR. MCCOMBER) I'm now going to hand you**

11 **Exhibit 17. Is Exhibit 17 the 2015 income tax return**

12 **you produced in this lawsuit?**

13 **A. Yes.**

14 **Q. And have you ever spoken with these tax**

15 **preparers at Garcia & King?**

16 **A. Only about my taxes.**

17 **Q. Now, looking at the second paragraph of**

18 **Exhibit 17, the first page, it says, "We will prepare**

19 **your 2015 federal and state income tax returns. We**

20 **will depend on you to provide the information we need**

21 **to prepare a complete and accurate return." So your**

22 **tax preparer is relying on you to provide them with**

23 **accurate information, correct?**

24 **A. Yes.**

25 **Q. Now, if you'll look on Exhibit 17 at the**



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1 bottom right-hand corner at PL Docs 56. Do you see  
 2 that it says Chase Bank at the top of this page?  
 3 THE INTERPRETER: Counsel?  
 4 MR. MCCOMBER: Right there.  
 5 A. Yes.  
 6 Q. (BY MR. MCCOMBER) Is that the same Chase Bank  
 7 account you've had for the last ten years?  
 8 A. Yes.  
 9 Q. And you received a deposit of \$926 as a tax  
 10 refund for the year 2015, correct?  
 11 A. Yes.  
 12 Q. And looking ahead to PL Docs 57 of Exhibit  
 13 17 -- and you understand this document was going to the  
 14 IRS, correct?  
 15 A. Yes.  
 16 Q. And it says under part two of this page,  
 17 "Under penalties of perjury, I declare that I have  
 18 examined a copy of my electronic individual income tax  
 19 return and accompanying schedules and statements for  
 20 the tax year ending December 31st, 2015. And to the  
 21 best of my knowledge and belief it is true, correct and  
 22 complete."  
 23 A. Yes.  
 24 Q. And you understand that your tax professional,  
 25 Garcia & King, signed this tax return on behalf of you

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1 and your wife under penalty of perjury.  
 2 A. Well, yes, and I signed what we filled out.  
 3 Q. And you received a tax refund based on what  
 4 you filled out and submitted and signed.  
 5 A. Yes, and they told me what I was going to  
 6 receive and what they would be depositing.  
 7 Q. And then looking at page PL Docs 58 of Exhibit  
 8 17, this is the page where you report your income for  
 9 the year 2015. Do you see that?  
 10 A. Yes.  
 11 Q. And you and your wife's income as reported was  
 12 \$29,708. Do you see that?  
 13 A. Yes.  
 14 Q. You didn't report any cash income you received  
 15 from Shan Namkeen that you're saying you received as  
 16 part of this lawsuit.  
 17 A. No, I didn't.  
 18 Q. And you knew you received that money, didn't  
 19 you, in 2015?  
 20 A. Yes.  
 21 Q. And you didn't disclose it to the IRS?  
 22 A. No.  
 23 Q. Did you disclose any of the income your wife  
 24 makes on her business of cleaning houses on the side  
 25 either?

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1 A. No.  
 2 Q. What other income did you not report in 2015  
 3 to the IRS?  
 4 A. Just those. I don't have any more businesses.  
 5 (Deposition Exhibits 18-19 marked.)  
 6 Q. (BY MR. MCCOMBER) I'm going to hand you  
 7 Exhibit 18 and 19. And Exhibit 18 is you and your  
 8 wife's 2014 tax return, correct?  
 9 A. Yes.  
 10 Q. And I presume that in 2014 you did not report  
 11 any cash income to the IRS for that year either, did  
 12 you?  
 13 A. No, I didn't.  
 14 Q. But you signed Exhibit 18 under penalty of  
 15 perjury?  
 16 A. Yes.  
 17 Q. And then Exhibit 19, you and your wife did not  
 18 report any cash income that year for 2013 either, did  
 19 you?  
 20 A. No.  
 21 Q. But you also signed Exhibit 19 under penalty  
 22 of perjury, correct?  
 23 A. Yes.  
 24 MR. PETERSEN: And, Counsel, was there  
 25 supposed to be an extra copy of Exhibit 19?

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1 MR. MCCOMBER: It's under there as well.  
 2 Sorry, they're sticking together.  
 3 MR. PETERSEN: That's fine. I just  
 4 wanted to make sure that the documents were correct.  
 5 (Pause.)  
 6 MR. MCCOMBER: Why don't we go ahead and  
 7 take a five-minute break and just stretch our legs a  
 8 little bit.  
 9 (Recess taken.)  
 10 Q. (BY MR. MCCOMBER) Mr. Rodriguez, before we  
 11 took a break we were talking about a few things, but I  
 12 want to follow-up on something that we talked about a  
 13 little earlier. You indicated earlier that you had  
 14 sent a letter that you wanted to drop the case against  
 15 my clients, and then you looked at some paperwork and  
 16 decided you still wanted to go forward with this  
 17 lawsuit. What was that paperwork?  
 18 A. Well, no, I didn't send anything.  
 19 Q. What paperwork did you look at?  
 20 A. Well, the letters that you were showing me.  
 21 That letter that you said that I put in the mailbox.  
 22 Q. That's what changed your mind about filing  
 23 this lawsuit?  
 24 A. Well, the lawsuit was already filed when those  
 25 letters appeared.

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1 Q. What is it that made you want to continue --  
 2 what -- strike that.  
 3 What document did you look at that  
 4 convinced you that you wanted to continue with this  
 5 lawsuit?  
 6 **A. The three documents that they made for me.**  
 7 Q. So there's nothing that you have that  
 8 convinced you to continue with the lawsuit?  
 9 **A. No.**  
 10 Q. Now, when you work a shift, you indicated  
 11 Monday through Friday the shift starts at around  
 12 7:00 a.m. and ends around 4:00 p.m.; is that correct?  
 13 **A. Well, it starts at 7:30 until 4:00.**  
 14 Q. Is that the same -- strike that.  
 15 Are the same hours done on Saturday and  
 16 Sunday?  
 17 **A. Well, sometimes it would be the same time, but**  
 18 **sometimes later.**  
 19 Q. What was the usual time for a Saturday or  
 20 Sunday shift?  
 21 **A. Well, we would start at 8:00 or 9:00 in the**  
 22 **morning and work until we finished doing everything we**  
 23 **needed done, but we didn't usually go past 4:00.**  
 24 Q. And this is true from 2013 through 2015?  
 25 **A. Yes.**

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1 Q. Prior to your deposition today, did you meet  
 2 with anyone about preparing for your deposition?  
 3 **A. No.**  
 4 Q. You never met with your lawyers at all?  
 5 **A. No. Well, I did come early. I came an hour**  
 6 **early and I was talking with them.**  
 7 Q. Did you do anything else to prepare for your  
 8 deposition other than that?  
 9 **A. No.**  
 10 Q. Did you bring any documents with you today?  
 11 **A. No.**  
 12 Q. Do you have a phone?  
 13 **A. Yes.**  
 14 Q. Do you send text messages?  
 15 **A. No.**  
 16 Q. Do you send e-mails?  
 17 **A. No.**  
 18 Q. You've never sent a text message?  
 19 **A. No.**  
 20 Q. Are you a religious man?  
 21 **A. Yes.**  
 22 Q. Do you go to church on Sunday?  
 23 **A. Yes. Yes, I do. Not every Sunday, because I**  
 24 **do have a job on the weekends.**  
 25 Q. What church do you go to?

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1 **A. It's called Maria La Imaculada La Catolica.**  
 2 Q. This is a Catholic church?  
 3 **A. Yes.**  
 4 Q. Were you raised Catholic?  
 5 **A. Yes.**  
 6 Q. How long have you been a member of this  
 7 church?  
 8 **A. Well, since I came here and I've been here for**  
 9 **ten years. I'm not really a member, I just visit.**  
 10 Q. Which mass do you typically attend?  
 11 **A. At 6:30 in the evening on Sundays.**  
 12 Q. You indicated several times during your  
 13 testimony -- you talked about Shirish Patel. Do you  
 14 remember that?  
 15 **A. Yes, I remember him.**  
 16 Q. Tell me about -- do you have any instances  
 17 where you feel like you were mistreated by him?  
 18 **A. No.**  
 19 Q. What about Shailesh?  
 20 **A. No.**  
 21 Q. Anyone mistreat you at all other than what  
 22 you've described today while you worked at  
 23 Shan Namkeen?  
 24 **A. No. Well, Shailesh and his brother are very**  
 25 **nice people. The wife, well, maybe she was very tense,**

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1 **having to deal with work, so she harassed me at work.**  
 2 **She used aggressive words with me.**  
 3 Q. Aggressive words. What are examples of that?  
 4 **A. Well, she was very mad and she would be**  
 5 **annoyed and she would talk to me in a very annoyed way.**  
 6 **I'm not going to say that really she used bad, bad**  
 7 **words.**  
 8 Q. Have you worked for tougher employers than  
 9 that?  
 10 **A. Well, some companies have been better and the**  
 11 **people there are more patient and they use better words**  
 12 **when they're asking you to do this or that.**  
 13 MR. MCCOMBER: I'm going to object as  
 14 nonresponsive.  
 15 Q. (BY MR. MCCOMBER) My question was really,  
 16 have you worked for a tougher boss than Ms. Patel?  
 17 **A. No.**  
 18 Q. Well, consider yourself lucky. Any other  
 19 specific instance where you can tell me about when  
 20 Ms. Patel was aggressive with you in any way?  
 21 **A. No, and if I saw her outside of work she**  
 22 **always treated me well. It was just at work she was**  
 23 **very tense and maybe that was why.**  
 24 Q. Who had the power to hire you or fire you at  
 25 Shan Namkeen?

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1 **A. Well, he hired me. But she was like the**  
 2 **manager there and she was the one that gave us orders**  
 3 **and instructions and she was in charge there.**  
 4 Q. Did Ms. Patel have any role in your pay?  
 5 **A. No.**  
 6 Q. Did you ever deal with any payment issues with  
 7 anyone except for Mr. Patel?  
 8 **A. No.**  
 9 Q. So you never had any payment -- so Shirish  
 10 Patel didn't have anything to do with your pay?  
 11 **A. Well, he and his brother dealt with the**  
 12 **payments. And so when I talked with him, he just said**  
 13 **that I had to wait to talk with him.**  
 14 Q. So the person who had the final decision was  
 15 Shailesh on your pay, correct?  
 16 **A. Yes.**  
 17 Q. Did Shirish have any other role with your  
 18 employment? Did he supervise you in any way?  
 19 **A. Well, he also gave me orders.**  
 20 Q. How often was that?  
 21 **A. Not very often. Well, he always remained**  
 22 **peaceful and he never annoyed me.**  
 23 Q. And you always understood that Shailesh had  
 24 the final say in decisions regarding your employment,  
 25 correct?

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1 **A. Well, yes.**  
 2 **(Deposition Exhibit 20 marked.)**  
 3 Q. (BY MR. MCCOMBER) I'm going to hand you  
 4 Exhibit 20. Exhibit 20 is the amended complaint you  
 5 filed in this lawsuit on January 23rd, 2017. Do you  
 6 see that?  
 7 **A. Yes.**  
 8 Q. Did you review Exhibit 20 and approve of it to  
 9 be filed?  
 10 **A. Yes.**  
 11 Q. Did you read it yourself or have someone read  
 12 it with you?  
 13 **A. Well, they read it to me themselves. Well,**  
 14 **the lady who is here.**  
 15 Q. Someone helped read it with you?  
 16 **A. Yes.**  
 17 Q. I'm going to ask you a few questions about  
 18 your allegations here. Looking at page 8 of Exhibit  
 19 20, on paragraph 20 it says, "From on or about June  
 20 15th, 2013 through on or about August 25th, 2013,  
 21 plaintiff Dimas Rodriguez worked an average of three  
 22 completely unpaid hours per week delivering goods for  
 23 the defendants." Is that a true statement?  
 24 **A. Yes.**  
 25 Q. What -- what are you talking about in that

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1 paragraph?  
 2 **A. Well, this isn't what I delivered, this is**  
 3 **what I would take from the company to the laundromat.**  
 4 **I left at 4:00 and then I would arrive over here at**  
 5 **5:00 and then I still had to unload all of that at the**  
 6 **laundromat. And so then what my wife had packaged up**  
 7 **the day before, then in the morning I had to load that**  
 8 **up, and I had to put that in there and then take it**  
 9 **over there and that was during the time that I wasn't**  
 10 **clocking in.**  
 11 Q. Well, Shan Namkeen has no record of you  
 12 working that period of time at the company. Do you  
 13 have any evidence that you worked there during that  
 14 period of time?  
 15 **A. Well, my wife knows about it because she was**  
 16 **the one that packed everything up and then I was the**  
 17 **one that took it over there.**  
 18 Q. What exactly -- tell me where you say your  
 19 wife was. What address was your wife at?  
 20 **A. I don't know the exact address, but it's Coin**  
 21 **Laundry on Josey Lane.**  
 22 Q. Which was near your home, correct?  
 23 **A. Yes, it's very close.**  
 24 Q. So three hours a week, how many trips was that  
 25 back and forth between the Coin Laundry and

Page 120

1 Shan Namkeen?  
 2 **A. Well, I always went to work there. If I**  
 3 **worked three or four days, I was always taking that.**  
 4 Q. But you can't tell me what specific day you  
 5 did this, can you?  
 6 **A. Well, on the days where I clocked in, because**  
 7 **all of the days I clocked in I was bringing things from**  
 8 **over there.**  
 9 Q. So you're claiming -- well, you didn't clock  
 10 in any day between June and August 25th.  
 11 **A. June, no. Not of 2013.**  
 12 Q. You didn't clock in until August of 2013.  
 13 **A. Not until December of 2014. Because that's**  
 14 **why I asked him why he wasn't paying me by check. And**  
 15 **so he said, okay. And that's when I filled out these**  
 16 **documents, because there weren't even any documents**  
 17 **that had been filled out.**  
 18 Q. Do you have those documents?  
 19 **A. No, because I just filled out -- well, you**  
 20 **know, like that application and then they kept that,**  
 21 **and then with that, then they made out my check.**  
 22 Q. So from June 15th, 2013 to August 25th, 2013,  
 23 what days did you make deliveries back and forth  
 24 between the Coin Laundry?  
 25 **A. Every day that I went to work there. If I**

Page 121

1 didn't go to work, then I didn't do it.

2 Q. So your testimony is every day you worked you

3 picked up product at the Coin Laundry and drove it to

4 Shan Namkeen?

5 A. Yes. Well, I would pick it up over there,

6 they would produce it. And I would take it over to the

7 Coin Laundry where my wife worked, because then she

8 would pack it into the correct bags. And then in the

9 morning I would go and pick up the boxes that have

10 already been packed and then I would take them to the

11 workplace in Garland at that company.

12 Q. So you picked up fully packaged product in the

13 morning and drove that to Shan Namkeen?

14 A. Yes.

15 Q. And at night you took unpackaged product from

16 Shan Namkeen to the Coin Laundry to be packaged into

17 bags.

18 A. Not at night, it was when I would clock out at

19 4:00 o'clock. Well, I didn't make any special trips,

20 it was only after I would finish working and he would

21 say, well, take three or four or two or one box.

22 Q. And you would leave work around 4:00 o'clock

23 p.m., correct, at Shan Namkeen?

24 A. Yes, it was 4:00 o'clock.

25 Q. And how long did it take you to get to the

Page 122

1 Coin Laundry?

2 A. An hour, sometimes more, sometimes less. It

3 would depend on traffic.

4 Q. Did anyone at Shan Namkeen ever tell you a

5 certain time that you had to be at the Coin Laundry?

6 A. No. Well, no, and I could get there late

7 because it was open.

8 Q. And you could run errands in between --

9 personal errands on the way home before you stopped

10 there too, correct?

11 A. Yes. Well, but I couldn't really take many

12 people there or many things there in the van with me,

13 because -- well, it smelled a lot like oil in the van.

14 Q. And you testified earlier that someone was

15 always with you that you were driving home with, right?

16 A. Yes.

17 Q. Who was that person?

18 A. Fabiola.

19 Q. Did Fabiola go with you to the Coin Laundry?

20 A. Yes.

21 Q. Every time you worked?

22 A. Yes. Yes, because I gave her a ride.

23 Q. And you dropped her off at home afterward?

24 A. Well, there was a supermarket called El Rancho

25 near my house and that's where she would leave her

Page 123

1 truck, so I would leave her off there and then she'd

2 get her truck and go on home.

3 Q. Was there ever days when you did not bring

4 some product from Shan Namkeen to the coin operated

5 laundry after work?

6 A. Well, there were very few days that I didn't

7 take something there. In fact, really most of the time

8 I did.

9 Q. Are you testifying today under oath that every

10 time you worked at Shan Namkeen that that shift ended

11 and you took product to the Coin Laundry?

12 A. Well, there were some days that I had to leave

13 early, like maybe 1:00 or 2:00, because I had things to

14 do, and then on that day I didn't bring anything.

15 Q. Did you leave any product -- when you left --

16 strike that.

17 When you picked up product at the coin

18 operated laundry in the morning on the way to work, did

19 you take all the product that was there and bring it to

20 Shan Namkeen?

21 A. What was packaged, yes. Sometimes I didn't,

22 because it wouldn't fit into my van, because there was

23 a lot there and it wouldn't fit.

24 Q. But did you take the majority of the product

25 at the Coin Laundry back to Shan Namkeen?

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1 A. Yes.

2 Q. And most of the time you would take all the

3 product that was there unless it wouldn't fit in your

4 van?

5 A. Well, no, sometimes I had to take those tubs

6 that were empty and I'd take them over there so they

7 could put more product into them.

8 Q. Who at the coin operated laundry packaged this

9 material you brought to them?

10 A. My wife.

11 Q. So it's your testimony that your wife sometime

12 after 4:00 o'clock in the afternoon would package this

13 product for Shan Namkeen that you brought and that you

14 would take it back the next morning to Shan Namkeen?

15 A. No, what I took to her that day, then she

16 would package another day. I was taking things that I

17 had taken the day before, so I would take something to

18 her and then -- two days later, and then I would take

19 that back.

20 Q. I feel like your story keeps changing as we

21 ask about it, so I'm going to ask you a few more

22 questions. What time during the day did your wife Ana

23 package this material you brought to the coin operated

24 laundry?

25 A. Okay. Well, her work was working in the

Page 125

1 **laundry. She would start work at 7:00 in the morning.**  
 2 **So she had to maintain those two jobs. She had to**  
 3 **maintain the laundry clean, attend to the customers and**  
 4 **then also work on the product. They wanted to keep her**  
 5 **busy.**  
 6 Q. And so --  
 7 MR. MCCOMBER: Objection, nonresponsive.  
 8 Q. (BY MR. MCCOMBER) What time during the day  
 9 did she package this material?  
 10 **A. Well, she didn't have a specific time, she**  
 11 **could sit down and do it for 15 minutes and then she**  
 12 **had to go attend to a customer, and then she could go**  
 13 **back to that, but then a customer might call her. So**  
 14 **she would just do it during the day.**  
 15 Q. How is that possible when she would have to go  
 16 to a separate room in order to package that material?  
 17 **A. It wasn't a separate room. There was a little**  
 18 **window there. It was just this wall that divided her**  
 19 **from the customers and there was a little camera in**  
 20 **there.**  
 21 Q. There's no door to get into that room from  
 22 inside the laundromat, is there?  
 23 **A. Yes, there's one just like this to go into**  
 24 **that room.**  
 25 Q. So you can go directly from the laundromat

Page 126

1 inside the laundromat to that room?  
 2 **A. Yes, you would just go through that door and**  
 3 **then go into that room where she was packing.**  
 4 Q. And you're as sure about that as all your  
 5 testimony today?  
 6 **A. Of course, I know that laundromat very well**  
 7 **for all the time that my wife worked there. In fact, I**  
 8 **would go sometimes and help her do the packing.**  
 9 Q. All right. Let's look back at Exhibit 20,  
 10 page 8. And exhibit -- on that page it says, "From on  
 11 or about August 26th, 2013 through on or about October  
 12 9th, 2015 plaintiff Dimas Rodriguez was paid an average  
 13 straight time rate of \$9 per hour, but worked an  
 14 average of three completely unpaid hours delivering  
 15 goods for defendants." Is that a true statement?  
 16 **A. Well, this word delivering is a little**  
 17 **misleading. It sounds as if I was delivering the**  
 18 **product to the restaurants.**  
 19 Q. And you're referring here to the fact that you  
 20 claim you were taking product from Shan Namkeen to the  
 21 Coin Laundry and back, right?  
 22 **A. Yes.**  
 23 Q. Looking at paragraph number 22 it says, "From  
 24 on or about June 15th, 2013 through on or about August  
 25 25th, 2013 plaintiff Dimas Rodriguez was paid an

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1 average straight time rate of \$5 per hour and was  
 2 required to work off the clock an average of eight  
 3 hours per day on an average of three Saturdays or  
 4 Sundays per month for which he was always paid in cash  
 5 at a straight time rate of \$5 per hour only."  
 6 **A. Yes.**  
 7 Q. That's true?  
 8 **A. Yes.**  
 9 Q. Well, you told me earlier that sometimes you  
 10 got paid \$5 per hour, sometimes six, sometimes seven.  
 11 **A. Well, here, you know, it's kind of like you're**  
 12 **trying to confuse me. I didn't really tally up or keep**  
 13 **a count of what they were paying me. I would just**  
 14 **receive my pay in cash. I didn't know if it was five,**  
 15 **six or \$7 per hour. I would just receive my \$40 for my**  
 16 **eight hours of work.**  
 17 Q. Do you know whether from June 15th, 2013 to  
 18 August 25th, 2013 you were ever paid more than \$5 per  
 19 hour?  
 20 **A. No.**  
 21 Q. You don't know what you were paid that period  
 22 of time, do you?  
 23 **A. Well, what I do know is that they -- that I**  
 24 **was given the \$40.**  
 25 Q. Only \$40 for eight hours during that period of

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1 time.  
 2 **A. Yes.**  
 3 Q. Page 9 of Exhibit 20, paragraph 23. You say,  
 4 "From on or about August 26th, 2013 through on or about  
 5 October 9th, 2015 claimant Dimas Rodriguez was paid an  
 6 average straight time rate of \$9 per hour, but was  
 7 required to work off the clock an average of eight  
 8 hours per day on an average of three Saturdays or  
 9 Sundays per month for which he was always paid in cash  
 10 at a straight time rate only." So you were actually  
 11 paid \$9 an hour during that period of time, aren't you?  
 12 **A. Well --**  
 13 MR. PETERSEN: Objection, misstates the  
 14 record. You can answer.  
 15 **A. Well, yes, and then, you know, they gave me**  
 16 **that raise. It was \$9 and then after that \$10 during**  
 17 **that time.**  
 18 **Q. (BY MR. MCCOMBER) So on the days you worked**  
 19 **on Saturdays or Sundays you were paid at least \$9 an**  
 20 **hour, although in cash, right?**  
 21 **A. I just received the money that I was given,**  
 22 **50 or \$60. I don't know if that was \$9 per hour or**  
 23 **not.**  
 24 **Q. Well, that's what you put in this document,**  
 25 **isn't it?**



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1 **A. Well, yes.**  
 2 **Q. And that's what you approved your lawyer to**  
 3 **file in this case, didn't you?**  
 4 **A. Yes.**  
 5 **Q. So do you want to change your story now or**  
 6 **not?**  
 7 **A. No, it's okay like that.**  
 8 **Q. So 2013 to 2015 when you worked on the**  
 9 **weekends you got paid at least \$9 an hour, right?**  
 10 **MR. PETERSEN: Same objection. You can**  
 11 **answer.**  
 12 **A. Well, yes. Yes.**  
 13 **Q. (BY MR. MCCOMBER) Paragraph 24 you say, "From**  
 14 **on or about August 26th through on or about October**  
 15 **9th, 2015 plaintiff Dimas Rodriguez continued to work**  
 16 **an average of 45 minutes of completely unpaid time per**  
 17 **week in defendant's facility after he was clocked out**  
 18 **by defendants."**  
 19 **A. Yes.**  
 20 **Q. But you testified earlier that you thought you**  
 21 **were getting paid for all the time you were working at**  
 22 **Shan Namkeen correctly, though, didn't you?**  
 23 **A. Exactly. And what's here is correct.**  
 24 **Everything that was clocked in and out is correct. I'm**  
 25 **not arguing that.**

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1 **Q. Well, were you clocking out at 4:00 o'clock to**  
 2 **drive to the Coin Laundry or were you hanging around**  
 3 **until almost 5:00 o'clock at Shan Namkeen?**  
 4 **A. No. No, I would clock out at 4:00 o'clock and**  
 5 **after that they didn't pay me.**  
 6 **Q. Did you leave or did you stay there after**  
 7 **4:00 o'clock at Shan Namkeen?**  
 8 **A. Well, while I was loading up the -- I would**  
 9 **load the things into the van and then I would come.**  
 10 **Q. And how long did you say the trip was from**  
 11 **Shan Namkeen to the Coin Laundry?**  
 12 **A. Well, as I said before, it would depend on the**  
 13 **traffic. Sometimes it was less than an hour, sometimes**  
 14 **it was an hour, sometimes it was more.**  
 15 **Q. Who was working with you after 4:00 o'clock**  
 16 **after you were clocked out?**  
 17 **A. No, I just came driving and Fabiola would be**  
 18 **with me. She would help me to unload them there at the**  
 19 **laundromat.**  
 20 **Q. So is it your testimony she also was at work**  
 21 **for 45 minutes after 4:00 o'clock with you?**  
 22 **A. Well, she was with me. She wasn't driving,**  
 23 **she was with me as I was driving and we came directly**  
 24 **from work to where we unloaded the product.**  
 25 **MR. MCCOMBER: Objection, nonresponsive,**

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1 move to strike.  
 2 **Q. (BY MR. MCCOMBER) Was she working with you at**  
 3 **Shan Namkeen after 4:00 o'clock p.m.?**  
 4 **A. No.**  
 5 **Q. So she quit working and you kept working?**  
 6 **A. You mean working there at the company?**  
 7 **Q. Yes.**  
 8 **A. Or when we would be coming to them to unload**  
 9 **the product at the Coin Laundry?**  
 10 **Q. Well, you testified you continued to work 45**  
 11 **minutes after you clocked out at Shan Namkeen. Was**  
 12 **anyone else working with you?**  
 13 **A. No, she was just with me.**  
 14 **Q. Did she witness you working after you were**  
 15 **clocked out?**  
 16 **A. Well, she clocked out at the same time I did.**  
 17 **MR. MCCOMBER: Objection, nonresponsive,**  
 18 **move to strike.**  
 19 **Q. (BY MR. MCCOMBER) Did she witness you working**  
 20 **after you were clocked out?**  
 21 **A. Yes.**  
 22 **Q. And so when I take her deposition she's going**  
 23 **to agree with you?**  
 24 **A. I think so. I don't know if she wants to do**  
 25 **it, but she was with me.**

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1 **Q. And then -- so you worked for 45 additional**  
 2 **minutes and then you claim you drove to the coin**  
 3 **operated laundry?**  
 4 **A. I didn't work. I clocked out and then I would**  
 5 **load up that product, and then I was just talking about**  
 6 **how long it would take me to get to the Coin Laundry.**  
 7 **Q. So the 45 minutes of being unpaid is the**  
 8 **amount of time it took you to go to the Coin Laundry?**  
 9 **A. Yes.**  
 10 **Q. And so when you -- you're actually saying the**  
 11 **same thing in paragraphs -- the delivery paragraph as**  
 12 **you're saying in this paragraph. That's the same**  
 13 **amount of time you're trying to talk about there, isn't**  
 14 **it?**  
 15 **A. Yes.**  
 16 **Q. So the 45 minutes of time you claim you spent**  
 17 **working after you clocked out refers to when you're**  
 18 **taking the product from Shan Namkeen to the coin**  
 19 **operated laundry?**  
 20 **A. Yes.**  
 21 **Q. Now, let's look at paragraph 25 of Exhibit 20.**  
 22 **It says, "Defendants willfully and intentionally**  
 23 **refused to pay plaintiff's overtime wages as required**  
 24 **by the Fair Labor Standards Act." Now, you indicated**  
 25 **earlier that you never asked them to pay you overtime,**

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1 did you?

2 **A. Yes, that's correct.**

3 Q. So they never refused a request by you to be

4 paid overtime, did they?

5 **A. No.**

6 Q. And you don't think the defendants

7 intentionally tried to withhold money from you, do you?

8 **A. No.**

9 Q. Defendants didn't do anything intentionally to

10 prevent you from getting paid, did they?

11 **A. No.**

12 MR. PETERSEN: And objection, misstates

13 the record. You can answer.

14 MR. MCCOMBER: Object to the sidebar.

15 Q. (BY MR. MCCOMBER) So you're claiming in this

16 lawsuit you have not been paid certain amounts in 2013,

17 '14 and '15, correct?

18 **A. Yes.**

19 Q. But you haven't calculated what you think

20 those amounts are, have you?

21 **A. No.**

22 Q. And you never deposited any of the money that

23 you were given in cash into your bank account?

24 **A. No.**

25 Q. Did any other employee ever complain to you at

Page 134

1 Shan Namkeen that they were not being paid for time

2 that they were working off the clock?

3 **A. No.**

4 Q. Were any other employees of Shan Namkeen doing

5 deliveries other than Mr. Patel?

6 **A. No, sometimes his brother.**

7 Q. Did Angel do any deliveries?

8 **A. Yes, he also did them, but I don't know where.**

9 Q. Do you know if he was paid for that time?

10 **A. No.**

11 Q. Did you ever talk to Angel about pay at

12 Shan Namkeen?

13 **A. No.**

14 Q. You and Angel didn't get along, did you?

15 **A. Not at the end, no.**

16 Q. In fact, didn't you tell Mr. Patel that you

17 would drop the lawsuit if he fired Angel?

18 **A. No.**

19 Q. Sir, you're under oath. Did you say that to

20 Mr. Patel?

21 **A. No.**

22 Q. You never said anything like that to him?

23 **A. No.**

24 Q. Not even as a joke?

25 **A. No.**

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1 THE INTERPRETER: And the interpreter is

2 getting clarification.

3 **A. Well, he worked in one warehouse and I worked**

4 **in the other and there was a fence or wall that divided**

5 **us.**

6 **(Deposition Exhibit 21 marked.)**

7 Q. (BY MR. MCCOMBER) I'm going to hand you

8 Exhibit 21. Exhibit 21 is a document served by your

9 lawyers in this case. And looking at Exhibit A to

10 Exhibit 21, it talks about your damages in this case.

11 Looking at the first portion it says, "Overtime damages

12 for Dimas Rodriguez." It says, "Completely unpaid

13 hours during the period of June 15th, 2013 through

14 October 15th, 2013." It says "\$185.13." Do you know

15 if that's true or not?

16 **A. No.**

17 Q. You didn't calculate that number, did you?

18 **A. No.**

19 Q. Look at the next section that says, "Weekend

20 hours paid at straight time only during period June

21 15th, 2013 through October 15th, 2013." And it says

22 "\$348.48." Do you see that?

23 **A. Yes.**

24 Q. Do you know if that's true or not?

25 **A. No.**

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1 Q. And you didn't calculate that, did you?

2 **A. No.**

3 Q. The next one says, "Completely unpaid hours

4 during the period October 16th, 2013 through October

5 9th, 2015." And that number is \$1,390.50. Do you see

6 that?

7 **A. Yes.**

8 Q. Do you know if that's a true number?

9 **A. No.**

10 Q. And you didn't calculate it, did you?

11 **A. No.**

12 Q. The next one says, "Weekend hours paid at

13 straight time only during period October 16th, 2013

14 through October 9th, 2015." It says "\$2,592." Do you

15 see that?

16 **A. Yes.**

17 Q. Do you know if that's true or not?

18 **A. No.**

19 Q. And you didn't calculate that either, did you?

20 **A. No.**

21 Q. And turning the page of Exhibit A, you'd give

22 me the same answers for the rest of those calculated

23 numbers, wouldn't you?

24 **A. Yes.**

25 Q. And you haven't done any calculation at all of

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1 what you think you're owed in this case, have you?

2 **A. No.**

3 Q. Do you know what -- what number do you think

4 is a fair number to be paid to you?

5 MR. PETERSEN: And I'm going to object on

6 optional completeness for Exhibit A, the introductory

7 paragraph.

8 Q. (BY MR. MCCOMBER) Do you -- do you have a

9 number that you think my client should pay you in this

10 lawsuit?

11 **A. No.**

12 Q. What do you think a fair number would be to

13 resolve this case?

14 MR. PETERSEN: Objection, calls for a

15 legal conclusion. You can answer.

16 **A. This case is in their hands. Whatever they**

17 **have to do to resolve this case, then it's up to them.**

18 Q. (BY MR. MCCOMBER) Are you going to ask a jury

19 to punish the defendants in this case for some reason?

20 **A. Not to punish them.**

21 Q. Well, you know this is financially punishing

22 them to have this lawsuit pending.

23 **A. Yes, but it's a part of my work that I'm owed.**

24 Q. But what amount is it? You've never asked

25 them for it. What amount do you want them to pay you?

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1 **A. Well, I don't know. I think in the long run**

2 **they're going to find out.**

3 Q. Well, you know that they have offered you

4 money to resolve this case, right?

5 **A. No.**

6 Q. They have.

7 **A. No one has offered me any money.**

8 Q. Do you dispute that they have offered to

9 settle this case for several thousand dollars?

10 MR. PETERSEN: And I'll object to

11 offering settlement negotiations into the record.

12 Q. (BY MR. MCCOMBER) Putting aside the number,

13 are you testifying today that you did not know my

14 clients had offered a settlement in this case?

15 **A. No.**

16 Q. No, you didn't know?

17 **A. No, I didn't.**

18 MR. MCCOMBER: Let's take a break and

19 I'll probably wrap up.

20 (Recess taken.)

21 Q. (BY MR. MCCOMBER) Mr. Rodriguez, before we

22 took a break we were talking about when you said that

23 you would deliver some product from Shan Namkeen to the

24 Coin Laundry. Do you recall that?

25 **A. Yes.**

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1 Q. Who was the employee at the Coin Laundry when

2 you delivered that material?

3 **A. I think his name is Jose.**

4 Q. What about Mihel?

5 THE INTERPRETER: The interpreter needs

6 clarification on the spelling.

7 MR. MCCOMBER: Is it M-I-H-E-L?

8 MR. PATEL: Miguel?

9 MR. MCCOMBER: Miguel.

10 THE INTERPRETER: Oh, Miguel.

11 **A. Well, I hardly -- well, I hardly ever spoke**

12 **with him. I just went to see my wife and I know that**

13 **his name was Jose.**

14 Q. (BY MR. MCCOMBER) But when you delivered the

15 product after work, your wife was not there, was she?

16 **A. She had already left.**

17 Q. Yeah, she worked from 7:00 a.m. to 3:30 p.m.,

18 correct?

19 **A. Yes.**

20 Q. What days of the week did she work at the Coin

21 Laundry?

22 **A. She worked six days a week and she was just**

23 **off on Saturdays.**

24 Q. So she worked Monday through Friday and

25 Sunday, correct?

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1 **A. Yes.**

2 Q. What hours did she work on Sunday?

3 **A. No, she was off on Sundays at the laundry.**

4 Q. Did she work on Saturday at the laundry?

5 **A. No. No, from Monday to Sunday, but then she**

6 **was off on Saturdays.**

7 Q. So she works on Sundays, correct?

8 **A. Yes.**

9 Q. She worked at the Coin Laundry every Sunday

10 from 2013 to 2015?

11 **A. Well, yes, she worked six days a week there**

12 **and -- well, I don't know, the story is a little bit**

13 **different. Before they made that little kitchen there**

14 **where later they used it for packing, because they**

15 **didn't have that company that later they had in**

16 **Garland. They did all the packing in that little room**

17 **there.**

18 Q. Well, that was before you started working at

19 Shan Namkeen, wasn't it?

20 **A. Yes.**

21 Q. All right. So let's answer my question.

22 Okay? She worked on Sundays at the Coin Laundry --

23 well, strike that.

24 Did she work on Saturday or Sunday at the

25 coin operated laundry?

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1 **A. Sundays.**  
 2 Q. And that was true from 2013 to 2015, correct?  
 3 **A. Well, I don't know how long she's been working**  
 4 **that schedule. She's been doing it for quite a while,**  
 5 **nine or ten years. She works many days a week. I do**  
 6 **too. I don't know that they changed her schedule.**  
 7 **Maybe they did from time to time.**  
 8 Q. Well, as you sit here today are you able to  
 9 testify under oath that she quit working on Sundays for  
 10 some period of time at the Coin Laundry?  
 11 **A. No. No, she's been working there for a long**  
 12 **time six days a week.**  
 13 Q. And so she never worked with you at Shan  
 14 Namkeen on a Sunday, did she?  
 15 **A. Yes.**  
 16 Q. She worked at both?  
 17 **A. She would go with me, because we would leave**  
 18 **Luis or Victoria at the laundromat.**  
 19 Q. When did that happen?  
 20 **A. When he would call us to tell us that he had**  
 21 **work on Sundays.**  
 22 Q. What day?  
 23 **A. On Sundays. When she had to work at the**  
 24 **laundromat on Sunday, she would leave Luis or Victoria**  
 25 **in charge.**

Page 142

1 Q. Give me a specific day that that happened.  
 2 **A. On the Sundays when he would call us to come**  
 3 **work and I'm going to say again I don't have the exact**  
 4 **days.**  
 5 Q. Some Sunday in the last three years. Is that  
 6 what you're telling me?  
 7 **A. Yes, and during that time we would go on**  
 8 **Sundays. She and I would always go.**  
 9 Q. You realize that it's getting a little absurd  
 10 how much your story is changing today. Do you get  
 11 that?  
 12 **A. Well, no, it's not absurd, it's just that**  
 13 **you're confusing me. You're talking about work that**  
 14 **was done a long time ago and you're talking about work**  
 15 **that someone else did.**  
 16 Q. The fact is every time you tell me a fact in  
 17 this case today, like a date or a time, if something  
 18 happens where that changes, you're just willing to say,  
 19 well, there was exceptions to everything.  
 20 **A. Well, in this case we're just talking about a**  
 21 **Saturday or a Sunday, but I don't really have exact**  
 22 **dates for you.**  
 23 Q. You have no dates for anything in this case  
 24 that you can tell me about, do you?  
 25 **A. No.**

Page 143

1 Q. You have no documents that support any of the  
 2 testimony you're giving me today, do you?  
 3 **A. No.**  
 4 Q. And your testimony contradicts all of the  
 5 documents I've showed you from Shan Namkeen, doesn't  
 6 it?  
 7 **A. Well, yes, if you say so.**  
 8 Q. Do you see how it would be hard for someone to  
 9 believe that Shan Namkeen would have a set of records  
 10 that it keeps detailed data on when you work, but then  
 11 it would just not keep records for when you're saying  
 12 you worked on Saturday? Do you see how unbelievable  
 13 that is?  
 14 **A. No.**  
 15 Q. Can you see how it would be hard to believe?  
 16 **A. Well, they have their documents and if I don't**  
 17 **have any documents, well, I just have it in my head.**  
 18 Q. But you don't have any specifics, do you?  
 19 **A. That's true, I don't.**  
 20 Q. And you wish you had, don't you?  
 21 THE INTERPRETER: And the interpreter is  
 22 going to get clarification.  
 23 **A. I never thought that this was going to happen.**  
 24 **If I knew that was going to happen, then I would have**  
 25 **written down everything, my days, my hours and all of**

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1 **that, but I didn't do that.**  
 2 Q. (BY MR. MCCOMBER) And you didn't do that  
 3 because you didn't think you were being underpaid, did  
 4 you?  
 5 **A. Well, no, I know that they didn't pay me.**  
 6 Q. But the reason you didn't keep any records is  
 7 because you didn't think that anything was wrong with  
 8 how you were being treated, did you?  
 9 **A. No.**  
 10 Q. So it just wasn't important enough to you to  
 11 keep records?  
 12 **A. Well, no, it was, but I just didn't do it.**  
 13 Q. And do you take responsibility for that?  
 14 **A. Yes.**  
 15 Q. And you're at fault too for not raising any of  
 16 these issues with your employer before hauling off and  
 17 filing a lawsuit, right?  
 18 MR. PETERSEN: Objection, calls for a  
 19 legal conclusion. You can answer.  
 20 **A. Yes.**  
 21 Q. (BY MR. MCCOMBER) Do you have any other  
 22 support for your claims in this case that I haven't  
 23 talked to you about today?  
 24 **A. No.**  
 25 Q. Do you want to change any of your testimony

Page 145

1 today?

2 **A. No.**

3 **(Discussion out of the hearing of the**

4 **reporter.)**

5 MR. MCCOMBER: All right. We'll pass the

6 witness.

7 EXAMINATION

8 BY MR. PETERSEN:

9 Q. All right. Good afternoon, Mr. Rodriguez.

10 That means that I now get the chance to ask you a few

11 questions. When you first -- or when you started

12 working for Shan Namkeen in 2013, who at the company

13 set your pay?

14 **A. Shailesh.**

15 Q. And there was -- or counsel asked you some

16 questions earlier about the types of goods that you

17 dealt with at Shan Namkeen and whether you knew if

18 those goods came from outside of Texas or were sold

19 outside of Texas. Do you remember those questions?

20 **A. Yes.**

21 Q. And did you personally order the ingredients

22 for Shan Namkeen?

23 **A. No.**

24 Q. Do you know who did?

25 **A. No.**

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1 Q. Okay. Did you handle -- or were you

2 responsible for sending invoices for Shan Namkeen to

3 the businesses or persons who bought the goods sold by

4 Shan Namkeen?

5 MR. MCCOMBER: Objection, compound.

6 **A. No.**

7 Q. (BY MR. PETERSEN) Let me ask you this: While

8 you were working at Shan Namkeen, what kinds of goods

9 did you actually -- or what kind of product did you

10 handle?

11 **A. Well, they call it Pani Puri and that's their**

12 **type of food. I don't really know what it is. It's**

13 **Indian food.**

14 Q. Okay. And do you know -- do you know what

15 type -- I'm sorry. Finish your answer.

16 **A. It's made out of flour. It's food. I don't**

17 **know how they use it or what they mix with it.**

18 Q. Other than the flour, though, are there other

19 things that are mixed in the flour to make the dough?

20 **A. Well, yes, they mix in the ingredients that**

21 **they have.**

22 Q. And were you the person who was responsible

23 for purchasing the machines that are used to make the

24 Pani Puri?

25 **A. No.**

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1 Q. And are you aware of any instances where Shan

2 Namkeen was trying to market or sell -- strike that.

3 Are you aware of any instances in which

4 Shan Namkeen was trying to sell its Pani Puri in either

5 the state of Illinois or the state of North Carolina

6 from 2013 to 2015?

7 MR. MCCOMBER: Objection, leading and

8 compound.

9 **A. Yes.**

10 Q. (BY MR. PETERSEN) And how were you aware of

11 that?

12 **A. Because Mr. Patel would go -- would go to try**

13 **to get those contracts.**

14 Q. And how did you know that Mr. Patel was trying

15 to go get the contracts?

16 **A. He would tell me.**

17 Q. When the raw materials would arrive at Shan

18 Namkeen, did you ever have to unload any of those?

19 MR. MCCOMBER: Objection, leading.

20 **A. Yes. Yes, among all of us that were there.**

21 **Well, just the men, not the women.**

22 Q. (BY MR. PETERSEN) And what types of things

23 did the men at Shan Namkeen have to unload?

24 **A. Well, it would be the flour and the bags,**

25 **boxes.**

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1 Q. And you testified earlier about transporting

2 some of the Pani Puri from the location in Garland to a

3 laundromat on Josey Lane.

4 **A. Yes.**

5 Q. Do you recall that?

6 **A. Yes.**

7 Q. Okay. And did you perform that task for Shan

8 Namkeen from 2013 when you started working there until

9 the end of your employment in 2015?

10 MR. MCCOMBER: Objection, leading.

11 **A. Yes.**

12 Q. (BY MR. PETERSEN) And I'm going to have to

13 ask you to look at a couple of documents here. First

14 you'll need Exhibit 5 and also Exhibit 4. And in

15 Exhibit 4, if you could turn to the page with the

16 number in the bottom right corner PL Docs 005. I'm

17 sorry, in Exhibit 5. Excuse me.

18 **A. (The witness complied.)**

19 Q. And then if you could turn in Exhibit 4 to the

20 page SNI 0063.

21 **A. (The witness complied.)**

22 Q. And I believe earlier counsel represented to

23 you that your checks reflected overtime when the

24 employee time details reflected that you worked

25 overtime working at Shan Namkeen.



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1 MR. MCCOMBER: Objection, misstates the  
2 testimony and the evidence.  
3 Q. (BY MR. PETERSEN) And if you could look at  
4 the document PL Docs 5. In the top right corner of  
5 that document it reflects pay of 40 hours; is that  
6 accurate?  
7 **A. Yes.**  
8 Q. Okay. And if you go down for the lines pay  
9 period beginning June 7th, 2014 and pay period ending  
10 June 13th, 2014. Okay. And if you'd turn to document  
11 SNI 0063. It's the employee time detail for the same  
12 period of time, June 7th, 2014 to June 13th, 2014. And  
13 if you'd look at the regular hours column in the middle  
14 of that page it reflects a total of 43.01 hours.  
15 Is that accurate?  
16 MR. MCCOMBER: Objection, calls for  
17 speculation.  
18 **A. Yes, I'm seeing that there.**  
19 Q. (BY MR. PETERSEN) Okay. And the 43.01 hours  
20 is actually 3.01 hours more for the same time period  
21 than is reflected on your paycheck. Is that accurate?  
22 MR. MCCOMBER: Objection, assumes facts  
23 not in evidence and misstates the testimony.  
24 **A. Yes.**  
25 Q. (BY MR. PETERSEN) During the period that you

Page 150

1 worked for Shan Namkeen, what day of the week was  
2 payday?  
3 **A. Friday.**  
4 Q. Okay. And how often were you paid?  
5 **A. Every week.**  
6 Q. And how did you receive your check?  
7 **A. They would give it to us there at the computer**  
8 **where we punched in and out.**  
9 Q. Okay. And what time during the day did you  
10 receive your check?  
11 **A. Like at 4:20, 4:30, 4:15.**  
12 Q. Okay. And was that before or after you  
13 clocked out on Friday?  
14 **A. Afterwards. Well, I was already punched out,**  
15 **the computer was turned off. They would just give us**  
16 **our checks.**  
17 Q. Okay. And in the time period between the  
18 punch out and the time that you received your check,  
19 did you still have to keep working?  
20 MR. MCCOMBER: Objection, leading.  
21 **A. Yes.**  
22 Q. (BY MR. PETERSEN) And what type of work did  
23 you have to do during that period of time?  
24 **A. The same thing. They always knew during the**  
25 **week what time we were going to be through. But on**

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1 **Friday they would have us do a little bit more.**  
2 **Because they knew that we had to wait for the check and**  
3 **that we had to work a little bit more.**  
4 Q. And earlier -- if you could, I would ask you  
5 to turn to Exhibit 14.  
6 **A. (The witness complied.)**  
7 Q. I just have a couple of questions about this.  
8 First, did you type this document?  
9 **A. I don't know how to type.**  
10 Q. Did you ask someone to type it for you?  
11 **A. No.**  
12 Q. Do you have any idea who did type the  
13 document?  
14 **A. Yes.**  
15 Q. Okay. And who do you believe typed the  
16 document?  
17 **A. Mr. Patel or his brother.**  
18 Q. Okay. And why do you think that?  
19 **A. Well, they were the ones that took us the**  
20 **documents that were already typed out for me to sign.**  
21 MR. MCCOMBER: Objection, nonresponsive.  
22 Q. (BY MR. PETERSEN) Now, if you could turn to  
23 Exhibit 21 and turn to the first page of Exhibit A.  
24 **A. (The witness complied.)**  
25 Q. And just the first paragraph of Exhibit A

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1 reads, "The following estimate is only preliminary and  
2 based on the allegations contained in the complaint.  
3 This estimate is subject to change as discovery is  
4 ongoing." And earlier you were asked -- opposing  
5 counsel asked you questions about the allegations in  
6 your complaint and is it still your testimony that  
7 those allegations are accurate?  
8 MR. MCCOMBER: Objection, leading.  
9 Q. (BY MR. PETERSEN) To your best recollection?  
10 MR. MCCOMBER: Objection, leading.  
11 **A. Yes.**  
12 Q. (BY MR. PETERSEN) I'll ask you this,  
13 Mr. Rodriguez: Do you have any formal training as a  
14 lawyer?  
15 MR. MCCOMBER: Objection, leading.  
16 **A. No.**  
17 Q. (BY MR. PETERSEN) And when you were  
18 transporting the snacks from the Garland location to  
19 the laundromat on Josey Lane, did you try to hide that  
20 from the defendants?  
21 MR. MCCOMBER: Objection, leading.  
22 **A. No.**  
23 Q. (BY MR. PETERSEN) Did anyone for Shan Namkeen  
24 ask you to do that?  
25 **A. No.**

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1 Q. I'm sorry, let me clarify that. Did anyone  
 2 for Shan Namkeen ask you to transport the goods from  
 3 Garland to Josey Lane and then back from Josey Lane to  
 4 Garland?  
 5 MR. MCCOMBER: Objection, compound and  
 6 leading.  
 7 **A. Yes.**  
 8 Q. (BY MR. PETERSEN) Okay. And who asked you to  
 9 do that?  
 10 **A. The three of them. Also his wife told me.**  
 11 Q. If you could turn back for just a moment to  
 12 Exhibit 4.  
 13 **A. (The witness complied.)**  
 14 Q. The first page of Exhibit 4 will be fine.  
 15 That's document SNI 0040. The time-in punches on this  
 16 employee time detail show a punch-in time of  
 17 7:30 exactly a.m. on December 28th, 2013 and a clock-in  
 18 time of 7:20 a.m. and zero seconds on December 30th,  
 19 2013 and a clock-in time of 7:30 a.m. and zero seconds  
 20 on December 31st, 2013. Do you see that on the  
 21 document?  
 22 **A. Yes.**  
 23 Q. Did you have a habit when you were working at  
 24 Shan Namkeen of clocking in the exact second the clock  
 25 ticked from one minute to the next every single morning

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1 that you worked there?  
 2 MR. MCCOMBER: Objection, leading.  
 3 **A. No.**  
 4 Q. (BY MR. PETERSEN) And other than the  
 5 actual -- the employees who were there working, did  
 6 anyone else have the ability to clock the employees  
 7 into the time system that you know of?  
 8 **A. Well, they didn't, but they would do it.**  
 9 Q. Okay. And who would do that?  
 10 **A. Well, Angel would do it. He would do it for**  
 11 **everybody. And -- but at one point I told him not to**  
 12 **do that anymore, that I would punch in my own starting**  
 13 **time. But for a long time he did it for me.**  
 14 Q. And after the punch-in time was entered on the  
 15 time system, whoever did it, do you know what happened  
 16 next in the system with that information?  
 17 **A. Well, I just knew that I had been punched in,**  
 18 **but I didn't really know what was done with that.**  
 19 MR. PETERSEN: I'll pass the witness.  
 20 EXAMINATION  
 21 BY MR. MCCOMBER:  
 22 Q. Mr. Rodriguez, you testified a minute ago that  
 23 you believe Mr. Patel went on a business trip to North  
 24 Carolina and/or Illinois to try to sell his products.  
 25 Do you recall that?

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1 **A. Yes.**  
 2 Q. When did that happen?  
 3 **A. Well, I'm not going to know the dates, but he**  
 4 **did go.**  
 5 Q. What year was it?  
 6 **A. I think it was in 2015.**  
 7 Q. Do you know whether any products were ever  
 8 sold by Shan Namkeen to either Illinois or North  
 9 Carolina?  
 10 THE INTERPRETER: The interpreter is  
 11 going to have to get clarification.  
 12 **A. Well, he hadn't yet sent the products there.**  
 13 **That's all.**  
 14 Q. (BY MR. MCCOMBER) And so no products were  
 15 shipped to either of those states while you worked  
 16 there, were they?  
 17 **A. Yes.**  
 18 Q. And so you don't know of any -- like you  
 19 said -- strike that.  
 20 Like -- strike that.  
 21 Like you testified earlier, you don't  
 22 know of any products being sold by Shan Namkeen outside  
 23 the state of Texas while you were working there, do  
 24 you?  
 25 **A. Yes.**

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1 Q. And you indicated also that you unloaded  
 2 products from time to time at Shan Namkeen, correct?  
 3 **A. Yes.**  
 4 Q. You listed flour, bags and boxes, didn't you?  
 5 **A. Yes.**  
 6 Q. You don't know where any of those ingredients  
 7 or materials came from, do you?  
 8 **A. No, just -- no, just the bags, because he**  
 9 **would have them made over there in India and then they**  
 10 **would be sent over here.**  
 11 Q. And you have personal knowledge of someone at  
 12 Shan Namkeen ordering bags from India?  
 13 **A. Yes.**  
 14 Q. So you saw someone order bags from India?  
 15 **A. No, he would go personally to order them.**  
 16 Q. How do you know that?  
 17 **A. He said that. He said that.**  
 18 Q. He told you that at some point?  
 19 **A. Yes. He told me when he had ordered them and**  
 20 **when they were going to arrive.**  
 21 Q. I'm just guessing, but I bet you don't know  
 22 the date that happened.  
 23 **A. No, but he did have them brought from there.**  
 24 Q. Anything you believe Mr. Patel or anyone else  
 25 brought from outside of Texas to make products at

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1 Shan Namkeen?

2 **A. No.**

3 Q. Now, you looked a minute ago at Exhibit Number

4 4. Do you recall that?

5 **A. Yes.**

6 Q. And you don't understand how the time clock

7 works, you just -- the time goes in and then it prints

8 out on a sheet, correct?

9 **A. Well, I don't know. I just would arrive and**

10 **punch in and I don't know where it was printed.**

11 Q. But then you would sign the Exhibit 4

12 documents indicating that they're correct, right?

13 **A. Yes.**

14 Q. And you also did not check -- strike that.

15 You also did not clock in and out at

16 lunch, did you?

17 **A. No.**

18 Q. So your lunch time had to be subtracted from

19 the time in Exhibit 4, correct?

20 MR. MCCOMBER: And it calls for a legal

21 conclusion. You can answer.

22 **A. Well, I know that we took a half an hour for**

23 **lunch, and all I know is I just clocked in and clocked**

24 **out.**

25 Q. (BY MR. MCCOMBER) And so you're not asking to

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1 be paid for a lunch period of time that you didn't

2 work, are you?

3 **A. Well, I would enter at 7:30 and leave at 4:00.**

4 **How many hours is that?**

5 Q. I'm sorry, I'm going to have to ask the

6 questions.

7 **A. Well, that was eight and a half hours and they**

8 **would take off that half hour.**

9 Q. Right. And you weren't expecting to be paid

10 for time at lunch where you didn't work, were you?

11 **A. No, they didn't pay that.**

12 Q. And then you said you got paid on Fridays,

13 correct?

14 **A. Yes.**

15 Q. And if you got your check on a Friday, even

16 though it was being prepared before you -- strike that.

17 You got your check on Friday and then

18 when you opened it up and looked at it, if you thought

19 there was something wrong with it, you would bring it

20 to Mr. Patel's attention, wouldn't you?

21 **A. Well, not at that moment, because he wasn't**

22 **there. He was hardly ever there.**

23 Q. But when you did bring it to his attention,

24 the several times you did he corrected it, didn't he?

25 **A. Yes.**

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1 Q. So you don't have any complaints about the way

2 you got your check on Friday, do you?

3 **A. No, just that every Friday they would give it**

4 **to us late. They never gave it to us at 4:00 o'clock.**

5 MR. MCCOMBER: I object to the

6 nonresponsive portion of that answer. Pass the

7 witness.

8 MR. PETERSEN: We will reserve any

9 further questions until a later time up to and

10 including the time of trial.

11 MR. MCCOMBER: We will also reserve our

12 remaining questions until the time of trial.

13 (Pause.)

14 MR. MCCOMBER: Back on the record.

15 During today's deposition when we referred to Mr. Patel

16 we were referring to the Mr. Patel in the room. And to

17 the extent we were referring to Shirish Patel, we named

18 him by name. Is that everyone's understanding?

19 MR. PETERSEN: Yes, Counsel.

20 MR. MCCOMBER: Thank you.

21

22

23

24

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Page 160

1 CHANGES AND SIGNATURE

2 WITNESS NAME: DATE OF DEPOSITION

3 DIMAS RODRIGUEZ June 27, 2017

4 PAGE LINE CHANGE REASON

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Page 161

1 I, DIMAS RODRIGUEZ, have read the foregoing  
2 deposition and hereby affix my signature that same is  
3 true and correct, except as noted above.  
4  
5  
6 DIMAS RODRIGUEZ \_\_\_\_\_  
7  
8  
9 THE STATE OF \_\_\_\_\_ )  
10 COUNTY OF \_\_\_\_\_ )  
11 Before me, \_\_\_\_\_, on this day  
12 personally appeared DIMAS RODRIGUEZ, known to me (or  
13 proved to me under oath) or through \_\_\_\_\_  
14 (description of identity card or other document) to be  
15 the person whose name is subscribed to the foregoing  
16 instrument and acknowledged to me that they executed  
17 the same for the purposes and consideration therein  
18 expressed.  
19 Given under my hand and seal of office this  
20 \_\_\_\_ day of \_\_\_\_\_, 2017.  
21  
22  
23 NOTARY PUBLIC IN AND FOR \_\_\_\_\_  
24 THE STATE OF \_\_\_\_\_  
25 MY COMMISSION EXPIRES: \_\_\_\_\_

Page 163

1 contains any changes and the reasons therefor;  
2 \_\_\_\_ was not requested by the deponent or a party  
3 before the completion of the deposition.  
4 I further certify that I am neither attorney or  
5 counsel for, nor related to, nor employed by any of the  
6 parties to the action in which this testimony was  
7 taken.  
8 Further, I am not a relative or employee of any  
9 attorney of record in this cause, nor do I have a  
10 financial interest in the action.  
11 Subscribed and sworn to on this 5th day of July,  
12 A.D., 2017.  
13  
14  
15 Jeff L. Foster, CSR, RMR, CRR \_\_\_\_\_  
16 Texas CSR No. 5434  
17 Expiration Date: 12/31/2018  
18 DepoTexas, Inc.  
19 DepoTexas Firm Registration No. 459  
20 6500 Greenville Avenue, Suite 445  
21 Dallas, Texas 75206  
22 (214) 373-4977  
23  
24  
25

Page 162

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF TEXAS  
3 DIMAS RODRIGUEZ, and all others )  
4 similarly situated under 29 )  
5 U.S.C. 216 (b), )  
6 Plaintiffs, ) C.A. NO.  
7 vs. ) 3:15-cv-03370-  
8 ) BK  
9 SHAN NAMKEEN, INC. and )  
10 SHAILESH PATEL, )  
11 Defendants. )  
12  
13 REPORTER'S CERTIFICATION  
14 ORAL DEPOSITION OF DIMAS RODRIGUEZ  
15 June 27, 2017  
16  
17 I, Jeff L. Foster, certified shorthand reporter  
18 in and for the State of Texas, do hereby certify to the  
19 following:  
20 That the witness, DIMAS RODRIGUEZ, was duly sworn  
21 by the officer and that the transcript of the oral  
22 deposition is a true record of the testimony given by  
23 the witness;  
24 I further certify that pursuant to FRCP Rule  
25 30(f)(1) that the signature of the deponent:  
26 \_\_X\_\_ was requested by the deponent or a party  
27 before the completion of the deposition and returned  
28 within 30 days from date or receipt of the transcript.  
29 If returned, the attached Changes and Signature Page

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**Employee Time Detail**

Period: 8/24/2013 - 8/30/2013  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 8/24/2013 - 8/30/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
8/26/2013 7:30:00 AM	8/26/2013 11:30:00 AM	4.00	0.00	4.00
8/27/2013 7:30:00 AM	8/27/2013 11:30:00 AM	4.00	0.00	4.00
8/28/2013 7:30:00 AM	8/28/2013 11:30:00 AM	4.00	0.00	4.00
8/29/2013 7:30:00 AM	8/29/2013 11:30:00 AM	4.00	0.00	4.00
8/30/2013 7:50:00 AM	8/30/2013 11:30:00 AM	4.00	0.00	4.00
		20.00	0.00	20.00



8/30/2013 4:19:44 PM

CONFIDENTIAL

APP 275



SNI 0022

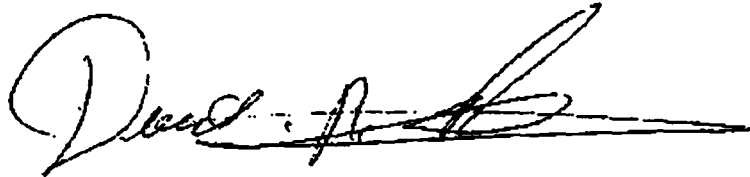


**Employee Time Detail**

Period: 8/31/2013 - 9/6/2013  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 8/31/2013 - 9/6/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/2/2013 7:30:00 AM	9/2/2013 11:30:00 AM	4.00	0.00	4.00
9/3/2013 7:30:00 AM	9/3/2013 11:30:00 AM	4.00	0.00	4.00
9/4/2013 8:00:00 AM	9/4/2013 11:30:00 PM	4.00	0.00	4.00
9/5/2013 7:30:00 AM	9/5/2013 11:30:00 AM	4.00	0.00	4.00
9/6/2013 7:40:00 AM	9/6/2013 11:40:00 AM	4.00	0.00	4.00
		20.00	0.00	20.00



9/6/2013 4:20:04 PM

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CONFIDENTIAL

SNI 0023

APP 276

# **Employee Time Detail**

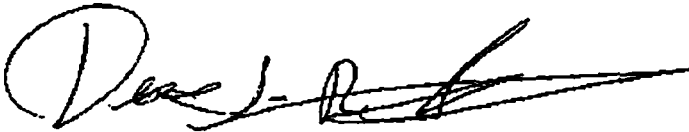
Period: 9/7/2013 - 9/13/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 9/7/2013 - 9/13/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/9/2013 10:30:00 AM	9/9/2013 2:30:00 PM	4.00	0.00	4.00
9/10/2013 12:00:00 PM	9/10/2013 4:00:00 PM	4.00	0.00	4.00
9/11/2013 7:30:00 AM	9/11/2013 11:30:00 PM	4.00	0.00	4.00
9/12/2013 7:30:00 AM	9/12/2013 11:10:00 AM	4.00	0.00	4.00
9/13/2013 7:30:00 AM	9/13/2013 11:00:00 AM	4.00	0.00	4.00
		20.00	0.00	20.00



9/13/2013 4:00:32 PM

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SNI 0024

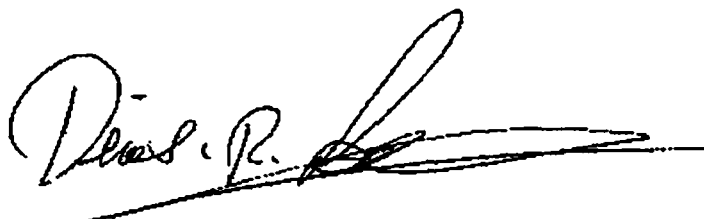
APP 277

**Employee Time Detail**

Period: 9/14/2013 - 9/20/2013  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 9/14/2013 - 9/20/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/18/2013 7:30:00 AM	9/18/2013 4:00:00 PM	8.50	0.00	8.50
9/19/2013 7:30:00 AM	9/19/2013 4:00:00 PM	8.50	0.00	8.50
9/20/2013 9:10:00 AM	9/20/2013 1:00:00 PM	4.00	0.00	4.00
		21.00	0.00	21.00



9/20/2013 4:07:40 PM

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CONFIDENTIAL

SNI 0025


APP 278

**Employee Time Detail**

Period: 9/21/2013 - 9/27/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 9/21/2013 - 9/27/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/24/2013 7:30:00 AM	9/24/2013 4:00:00 PM	8.50	0.00	8.50
9/25/2013 7:40:00 AM	9/25/2013 4:00:00 PM	8.33	0.00	8.33
9/26/2013 7:30:00 AM	9/26/2013 4:00:00 PM	8.50	0.00	8.50
9/27/2013 7:30:00 AM	9/27/2013 4:10:00 PM	8.67	0.00	8.67
		34.00	0.00	34.00



9/27/2013 4:08:22 PM

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SNI 0026

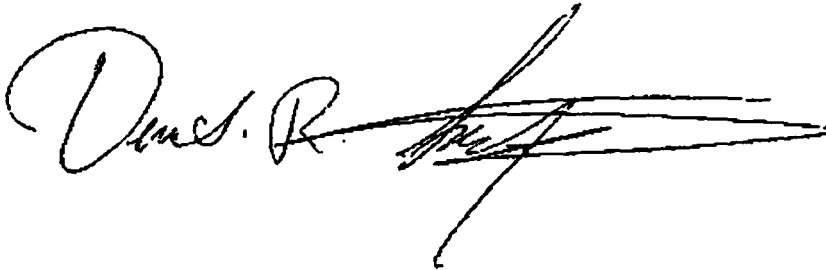
APP 279

**Employee Time Detail**

Period: 9/28/2013 - 10/4/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 9/28/2013 - 10/4/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/30/2013 7:30:00 AM	9/30/2013 4:00:00 PM	8.50	0.00	8.50
10/1/2013 7:30:00 AM	10/1/2013 4:30:00 PM	8.50	0.00	8.50
10/2/2013 7:30:00 AM	10/2/2013 11:40:00 AM	4.17	0.00	4.17
10/3/2013 7:30:00 AM	10/3/2013 4:00:00 PM	8.50	0.00	8.50
10/4/2013 7:30:00 AM	10/4/2013 4:00:00 PM	8.50	0.00	8.50
		38.17	0.00	38.17



10/4/2013 4:04:38 PM

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CONFIDENTIAL

SNI 0027

APP 280



**Employee Time Detail**

Period: 10/5/2013 - 10/11/2013  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID:                      Name: Dimas Rodríguez                      Period: 10/5/2013 - 10/11/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>OVT Hours</u>	<u>Total Hours</u>
10/7/2013 7:30:00 AM	10/7/2013 4:00:00 PM	8.50	0.00	8.50
10/8/2013 7:30:00 AM	10/8/2013 4:00:00 PM	8.50	0.00	8.50
10/9/2013 7:30:00 AM	10/9/2013 4:00:00 PM	8.50	0.00	8.50
10/10/2013 7:30:00 AM	10/10/2013 4:00:00 PM	8.50	0.00	8.50
10/11/2013 7:30:00 AM	10/11/2013 4:10:00 PM	8.67	0.00	8.67
		42.67	0.00	42.67

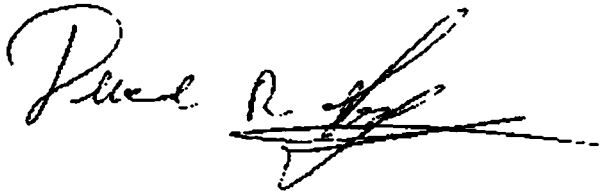


**Employee Time Detail**

Period: 10/12/2013 - 10/18/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 10/12/2013 - 10/18/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
10/14/2013 7:40:00 AM	10/14/2013 4:00:00 PM	8.33	0.00	8.33
10/15/2013 7:40:00 AM	10/15/2013 4:10:00 PM	8.50	0.00	8.50
10/16/2013 7:30:00 AM	10/16/2013 4:00:00 PM	8.50	0.00	8.50
10/17/2013 7:30:00 AM	10/17/2013 4:10:00 PM	8.67	0.00	8.67
		34.00	0.00	34.00



10/25/2013 3:45:55 PM

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CONFIDENTIAL

SNI 0029

APP 282

**Employee Time Detail**

Period: 10/19/2013 - 10/25/2013  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 10/19/2013 - 10/25/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
10/21/2013 7:30:00 AM	10/21/2013 4:00:00 PM	8.50	0.00	8.50
10/22/2013 7:30:00 AM	10/22/2013 4:00:00 PM	8.50	0.00	8.50
10/23/2013 7:00:00 AM	10/23/2013 3:00:00 PM	8.00	0.00	8.00
10/24/2013 7:30:00 AM	10/24/2013 4:10:00 PM	8.67	0.00	8.67
10/25/2013 7:30:00 AM	10/25/2013 4:10:00 PM	8.67	0.00	8.67
		42.34	0.00	42.34



10/25/2013 4:09:35 PM

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SNI 0030

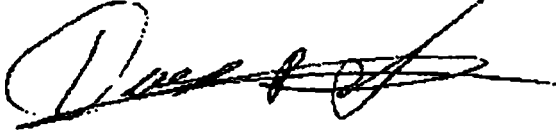
APP 283

**Employee Time Detail**

Period: 11/16/2013 - 11/22/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 11/16/2013 - 11/22/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
11/21/2013 7:20:00 AM	11/21/2013 4:00:00 PM	8.67	0.00	8.67
		8.67	0.00	8.67



11/22/2013 3:44:35 PM

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SNI 0031

APP 284

**Employee Time Detail**

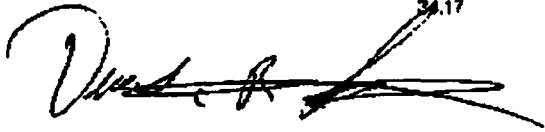
Period: 10/26/2013 - 11/1/2013  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 10/26/2013 - 11/1/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
10/28/2013 7:40:00 AM	10/28/2013 4:00:00 PM	8.33	0.00	8.33
10/29/2013 7:30:00 AM	10/29/2013 4:00:00 PM	8.50	0.00	8.50
10/30/2013 7:30:00 AM	10/30/2013 4:10:00 PM	8.67	0.00	8.67
10/31/2013 7:30:00 AM	10/31/2013 4:10:00 PM	8.67	0.00	8.67
		<u>34.17</u>	<u>0.00</u>	<u>34.17</u>



11/8/2013 2:47:31 PM

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SNI 0032

APP 285

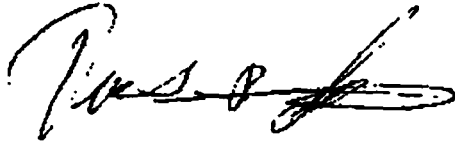


**Employee Time Detail**

Period: 11/2/2013 - 11/8/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 11/2/2013 - 11/8/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
11/7/2013 7:10:00 AM	11/7/2013 4:00:00 PM	8.83	0.00	8.83
		8.83	0.00	8.83



**Employee Time Detail**

Period: 11/9/2013 - 11/15/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:**                      **Name:** Dimas Rodriguez                      **Period:** 11/9/2013 - 11/15/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
11/14/2013 7:30:00 AM	11/14/2013 4:00:00 PM	8.50	0.00	8.50
		8.50	0.00	8.50



11/15/2013 4:10:02 PM

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SNI 0034

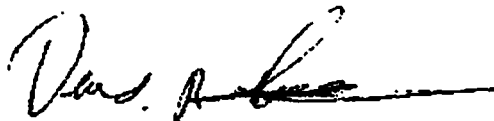
APP 287

**Employee Time Detail**

Period: 11/23/2013 - 11/29/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 11/23/2013 - 11/29/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
11/26/2013 10:50:00 AM	11/26/2013 4:00:00 PM	5.17	0.00	5.17
11/27/2013 7:30:00 AM	11/27/2013 4:00:00 PM	6.50	0.00	6.50
11/28/2013 7:30:00 AM	11/28/2013 4:00:00 PM	6.50	0.00	6.50
		22.17	0.00	22.17



**Employee Time Detail**

Period: 11/30/2013 - 12/6/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:**                      **Name:** Dimas Rodriguez                      **Period:** 11/30/2013 - 12/6/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
12/3/2013 7:30:00 AM	12/3/2013 4:10:00 PM	8.67	0.00	8.67
12/4/2013 7:30:00 AM	12/4/2013 4:00:00 PM	8.50	0.00	8.50
12/5/2013 7:20:00 AM	12/5/2013 3:40:00 PM	8.33	0.00	8.33
		25.50	0.00	25.50



12/6/2013 3:49:45 PM

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SNI 0036

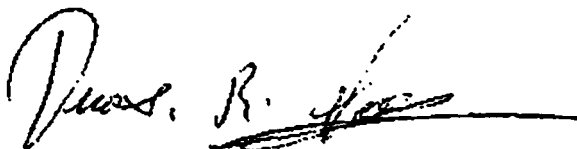
APP 289

**Employee Time Detail**

Period: 12/7/2013 - 12/13/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 12/7/2013 - 12/13/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
12/10/2013 7:40:00 AM	12/10/2013 4:00:00 PM	8.33	0.00	8.33
12/13/2013 7:30:00 AM	12/13/2013 4:00:00 PM	8.50	0.00	8.50
		16.83	0.00	16.83



12/13/2013 3:59:04 PM

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SNI 0037

APP 290

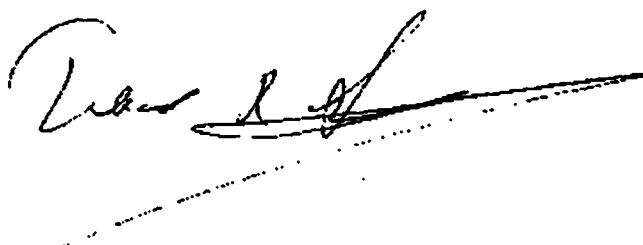


# **Employee Time Detail**

Period: 12/14/2013 - 12/21/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 12/14/2013 - 12/21/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
12/16/2013 7:50:00 AM	12/16/2013 4:00:00 PM	8.17	0.00	8.17
12/17/2013 7:30:00 AM	12/17/2013 4:00:00 PM	8.50	0.00	8.50
		16.67	0.00	16.67



12/28/2013 3:35:19 PM

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SNI 0038

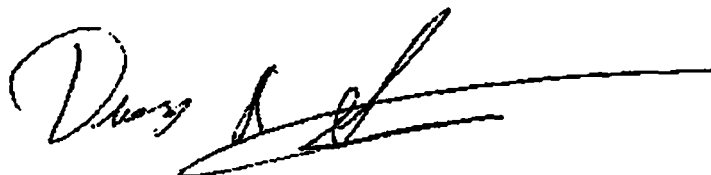
APP 291

**Employee Time Detail**

Period: 12/21/2013 - 12/27/2013  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 12/21/2013 - 12/27/2013

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
12/26/2013 7:30:00 AM	12/26/2013 4:00:00 PM	8.50	0.00	8.50
12/27/2013 7:20:00 AM	12/27/2013 4:20:00 PM	9.00	0.00	9.00
		17.50	0.00	17.50



12/28/2013 3:36:28 PM

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SNI 0039

APP 292

a Employee's SSN		1 Wages, tips, other compensation		2 Federal income tax withheld	
[REDACTED]		2,947.13		[REDACTED]	
OMB No. 1545-0008		3 Social security wages		4 Social security tax withheld	
[REDACTED]		2,947.13		182.71	
b Employer identification number		5 Medicare wages and tips		6 Medicare tax withheld	
[REDACTED]		2,947.13		42.70	
c Employer's name, address, and ZIP code					
SHAN NAMKEEN, INC					
2731 NATIONAL CIRCLE SUITE 101					
GARLAND TX 75041					
e Employee's first name and initial		Last name		Suff.	
DIMAS		RODRIGUES			
12879 S JOSEY LN 170					
FARMERS BRANCH TX 75234					
f Employee's address and Zip code					
d Control number		7 Social security tips		8 Allocated tips	
9		10 Dependent care benefits		11 Nonqualified plans	
12a		14 Other			
12b					
12c					
12d					
13 Statutory employee <input type="checkbox"/>		Retirement plan <input type="checkbox"/>		Third-party sick pay <input type="checkbox"/>	
15 State Employer's state ID number		16 State wages, tips, etc.		17 State income tax	
18 Local wages, tips, etc.		19 Local income tax		20 Locality name	

Form **W-2** Wage and Tax Statement **2013** Department of Treasury-Internal Revenue Service  
Copy B - To Be Filed With Employee's FEDERAL Tax Return.

a Employee's SSN		1 Wages, tips, other compensation		2 Federal income tax withheld	
[REDACTED]		2,947.13		[REDACTED]	
OMB No. 1545-0008		3 Social security wages		4 Social security tax withheld	
[REDACTED]		2,947.13		182.71	
b Employer identification number		5 Medicare wages and tips		6 Medicare tax withheld	
[REDACTED]		2,947.13		42.70	
c Employer's name, address, and ZIP code					
SHAN NAMKEEN, INC					
2731 NATIONAL CIRCLE SUITE 101					
GARLAND TX 75041					
d Control number		7 Social security tips		8 Allocated tips	
9		10 Dependent care benefits		11 Nonqualified plans	
12a		14 Other			
12b					
12c					
12d					
13 Statutory employee <input type="checkbox"/>		Retirement plan <input type="checkbox"/>		Third-party sick pay <input type="checkbox"/>	
15 State Employer's state ID number		16 State wages, tips, etc.		17 State income tax	
18 Local wages, tips, etc.		19 Local income tax		20 Locality name	

Form **W-2** Wage and Tax Statement **2013** Department of Treasury-Internal Revenue Service  
Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return.

a Employee's SSN		1 Wages, tips, other compensation		2 Federal income tax withheld	
[REDACTED]		2,947.13		[REDACTED]	
OMB No. 1545-0008		3 Social security wages		4 Social security tax withheld	
[REDACTED]		2,947.13		182.71	
b Employer identification number		5 Medicare wages and tips		6 Medicare tax withheld	
[REDACTED]		2,947.13		42.70	
c Employer's name, address, and ZIP code					
SHAN NAMKEEN, INC					
2731 NATIONAL CIRCLE SUITE 101					
GARLAND TX 75041					
e Employee's first name and initial		Last name		Suff.	
DIMAS		RODRIGUES			
12879 S JOSEY LN 170					
FARMERS BRANCH TX 75234					
f Employee's address and Zip code					
d Control number		7 Social security tips		8 Allocated tips	
9		10 Dependent care benefits		11 Nonqualified plans	
12a		14 Other			
12b					
12c					
12d					
13 Statutory employee <input type="checkbox"/>		Retirement plan <input type="checkbox"/>		Third-party sick pay <input type="checkbox"/>	
15 State Employer's state ID number		16 State wages, tips, etc.		17 State income tax	
18 Local wages, tips, etc.		19 Local income tax		20 Locality name	

Form **W-2** Wage and Tax Statement **2013** Copy C - For EMPLOYEE'S RECORDS.

This information is being furnished to the Internal Revenue Service. If you are required to file a tax return, a negligence penalty or other sanction may be imposed on you if this income is taxable and you fail to report it.

a Employee's SSN		1 Wages, tips, other compensation		2 Federal income tax withheld	
[REDACTED]		2,947.13		[REDACTED]	
OMB No. 1545-0008		3 Social security wages		4 Social security tax withheld	
[REDACTED]		2,947.13		182.71	
b Employer identification number		5 Medicare wages and tips		6 Medicare tax withheld	
[REDACTED]		2,947.13		42.70	
c Employer's name, address, and ZIP code					
SHAN NAMKEEN, INC					
2731 NATIONAL CIRCLE SUITE 101					
GARLAND TX 75041					
e Employee's first name and initial		Last name		Suff.	
DIMAS		RODRIGUES			
12879 S JOSEY LN 170					
FARMERS BRANCH TX 75234					
f Employee's address and Zip code					
d Control number		7 Social security tips		8 Allocated tips	
9		10 Dependent care benefits		11 Nonqualified plans	
12a		14 Other			
12b					
12c					
12d					
13 Statutory employee <input type="checkbox"/>		Retirement plan <input type="checkbox"/>		Third-party sick pay <input type="checkbox"/>	
15 State Employer's state ID number		16 State wages, tips, etc.		17 State income tax	
18 Local wages, tips, etc.		19 Local income tax		20 Locality name	

Form **W-2** Wage and Tax Statement **2013**

Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return.

DEPOSITION  
800-631-0888

DEPOSITION  
EXHIBIT

2

## SHAN NAMKEEN, INC

## Payroll Register

For the Period From Jan 1, 2013 to Dec 31, 2013

Filter Criteria includes: 1) Employee IDs: ROD03 Report order is by Check Date Report is printed in Detail Format

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hr	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_E	Medi FUT
ROD03 DIMAS RODRIGUES XXX-XX-1175 2710 8/30/13	Regular	20.00	7.25	145.00	133.91	145.00 -0.78	-8.99	-8.99 -2.10	-2.10 -0.87
ROD03 DIMAS RODRIGUES XXX-XX-1175 2714 9/6/13	Regular	20.00	7.25	145.00	133.91	145.00 -0.78	-8.99	-8.99 -2.10	-2.10 -0.87
ROD03 DIMAS RODRIGUES XXX-XX-1175 2714 9/13/13	Regular	20.00	7.25	145.00	133.91	145.00 -0.78	-8.99	-8.99 -2.10	-2.10 -0.87
ROD03 DIMAS RODRIGUES XXX-XX-1175 2722 9/20/13	Regular	20.00	7.25	145.00	133.91	145.00 -0.78	-8.99	-8.99 -2.10	-2.10 -0.87
ROD03 DIMAS RODRIGUES XXX-XX-1175 2734 9/27/13	Regular	32.00	7.25	232.00	214.26	232.00 -1.25	-14.38	-14.38 -3.36	-3.36 -1.39
ROD03 DIMAS RODRIGUES XXX-XX-1175 2738 10/4/13	Regular	36.00	7.25	261.00	241.04	261.00 -1.41	-16.18	-16.18 -3.78	-3.78 -1.57
ROD03 DIMAS RODRIGUES XXX-XX-1175 2747 10/11/13	Regular	40.00	7.25	290.00	267.81	290.00 -1.57	-17.98	-17.98 -4.21	-4.21 -1.74
ROD03 DIMAS RODRIGUES XXX-XX-1175 2478 10/18/13	Regular	32.00	7.25	232.00	214.26	232.00 -1.25	-14.38	-14.38 -3.36	-3.36 -1.39

11/13/14 at 14:58:39 90

CONFIDENTIAL

APP 294



## SHAN NAMKEEN, INC

## Payroll Register

For the Period From Jan 1, 2013 to Dec 31, 2013

Filter Criteria includes 1) Employee IDs ROD03 Report order is by Check Date Report is printed in Detail Format

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hr	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_E	Medi FUT
ROD03 DIMAS RODRIGUES XXX-XX-1175 2484 10/25/13	Regular	37.00	7.25	268.25	247.73	268.25 -1.45	-16.63	-16.63 -3.89	-3.89 -1.61
ROD03 DIMAS RODRIGUES XXX-XX-1175 2489 11/1/13	Regular	32.00	7.25	232.00	214.26	232.00 -1.25	-14.38	-14.38 -3.36	-3.36 -1.39
ROD03 DIMAS RODRIGUES XXX-XX-1175 2499 11/8/13	Regular	8.00	7.25	58.00	53.56	58.00 -0.31	-3.60	-3.60 -0.84	-0.84 -0.35
ROD03 DIMAS RODRIGUES XXX-XX-1175 2474 11/15/13	Regular	8.00	7.25	58.00	53.56	58.00 -0.31	-3.60	-3.60 -0.84	-0.84 -0.35
ROD03 DIMAS RODRIGUES XXX-XX-1175 2506 11/22/13	Regular	8.00	7.25	58.00	53.56	58.00 -0.31	-3.60	-3.60 -0.84	-0.84 -0.35
ROD03 DIMAS RODRIGUES XXX-XX-1175 2514 11/29/13	Regular	24.00	7.25	174.00	160.69	174.00 -0.94	-10.79	-10.79 -2.52	-2.52 -1.04
ROD03 DIMAS RODRIGUES XXX-XX-1175 2528 12/6/13	Regular	21.50	7.25	155.88	143.96	155.88 -0.84	-9.66	-9.66 -2.26	-2.26 -0.94
ROD03 DIMAS RODRIGUES XXX-XX-1175 2534 12/13/13	Regular	16.00	7.25	116.00	107.13	116.00 -0.63	-7.19	-7.19 -1.68	-1.68 -0.70

11/13/14 at 14:58:39 90

CONFIDENTIAL

APP 295

Page: 2  
SNI 0006



## SHAN NAMKEEN, INC

## Payroll Register

For the Period From Jan 1, 2013 to Dec 31, 2013

Filter Criteria includes 1) Employee IDs ROD03 Report order is by Check Date Report is printed in Detail Format

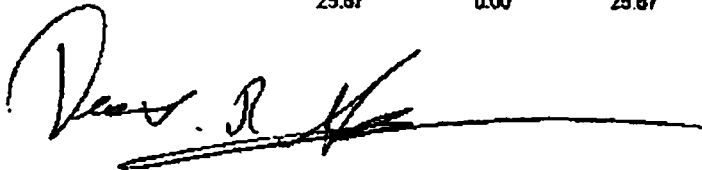
Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hr	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_E	Medi FUT
ROD03 DIMAS RODRIGUES XXX-XX-1175 2540 12/20/13	Regular	16.00	7.25	116.00	107.13	116.00 -0.63	-7.19	-7.19 -1.68	-1.68 -0.70
ROD03 DIMAS RODRIGUES XXX-XX-1175 2525 12/27/13	Regular	16.00	7.25	116.00	107.13	116.00 -0.63	-7.19	-7.19 -1.68	-1.68 -0.70

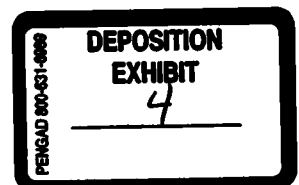
**Employee Time Detail**

Period: 12/28/2013 - 1/3/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:**                      **Name:** Dimas Rodriguez                      **Period:** 12/28/2013 - 1/3/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
12/28/2013 7:30:00 AM	12/28/2013 4:00:00 PM	8.50	0.00	8.50
12/30/2013 7:20:00 AM	12/30/2013 4:00:00 PM	8.67	0.00	8.67
12/31/2013 7:30:00 AM	12/31/2013 4:00:00 PM	8.50	0.00	8.50
		25.67	0.00	25.67





1/3/2014 4:14:05 PM

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SNI 0040

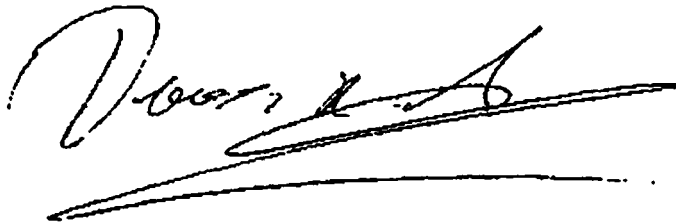
APP 297

**Employee Time Detail**

Period: 1/4/2014 - 1/10/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 1/4/2014 - 1/10/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
1/9/2014 7:20:00 AM	1/9/2014 4:00:00 PM	8.87	0.00	8.87
1/10/2014 7:20:00 AM	1/10/2014 3:50:00 PM	8.50	0.00	8.50
		17.17	0.00	17.17



1/10/2014 3:55:02 PM

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SNI 0041

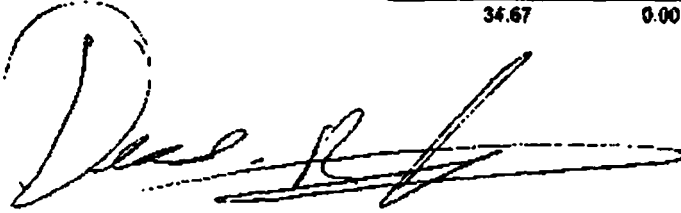
APP 298

**Employee Time Detail**

Period: 1/11/2014 - 1/17/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 1/11/2014 - 1/17/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>OVT Hours</u>	<u>Total Hours</u>
1/14/2014 7:20:00 AM	1/14/2014 4:00:00 PM	8.67	0.00	8.67
1/15/2014 7:10:00 AM	1/15/2014 4:00:00 PM	8.83	0.00	8.83
1/16/2014 7:30:00 AM	1/16/2014 4:10:00 PM	8.67	0.00	8.67
1/17/2014 7:30:00 AM	1/17/2014 4:00:00 PM	8.50	0.00	8.50
		34.67	0.00	34.67



1/24/2014 9 18:11 AM

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SNI 0042

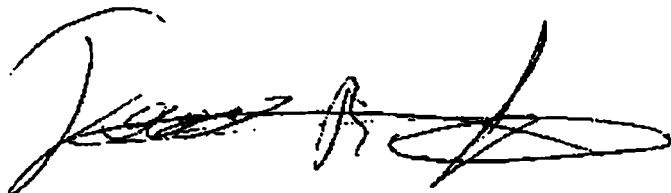
APP 299

**Employee Time Detail**

Period: 1/18/2014 - 1/24/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 1/18/2014 - 1/24/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
1/22/2014 7:20:00 AM	1/22/2014 4:00:00 PM	8.67	0.00	8.67
1/23/2014 7:30:00 AM	1/23/2014 4:00:00 PM	8.50	0.00	8.50
		17.17	0.00	17.17




## Employee Time Detail

Period: 1/25/2014 - 1/31/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 1/25/2014 - 1/31/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
1/27/2014 8:20:00 AM	1/27/2014 4:00:00 PM	7.67	0.00	7.67
1/28/2014 7:20:00 AM	1/28/2014 4:00:00 PM	8.67	0.00	8.67
1/29/2014 7:20:00 AM	1/29/2014 4:00:00 PM	8.67	0.00	8.67
1/30/2014 7:20:00 AM	1/30/2014 4:00:00 PM	8.67	0.00	8.67
1/31/2014 7:30:00 AM	1/31/2014 4:00:00 PM	8.50	0.00	8.50
		42.18	0.00	42.18



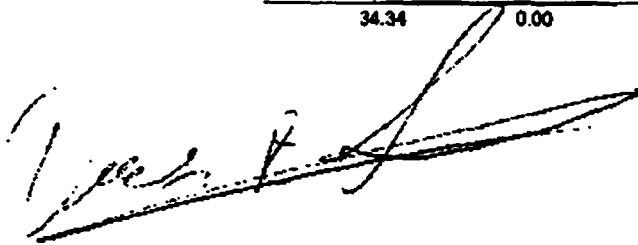


**Employee Time Detail**

Period: 2/1/2014 - 2/7/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 2/1/2014 - 2/7/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
2/4/2014 7:20:00 AM	2/4/2014 4:00:00 PM	8.67	0.00	8.67
2/5/2014 7:20:00 AM	2/5/2014 4:00:00 PM	8.67	0.00	8.67
2/6/2014 7:30:00 AM	2/6/2014 4:00:00 PM	8.50	0.00	8.50
2/7/2014 8:00:00 AM	2/7/2014 4:00:00 PM	8.50	0.00	8.50
		34.34	0.00	34.34



2/14/2014 2:02:47 PM

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SNI 0045

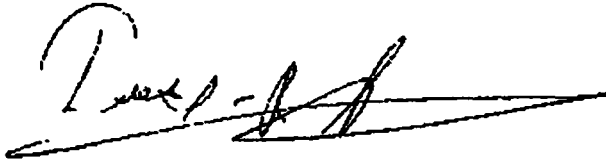
APP 302

## Employee Time Detail

Period: 2/8/2014 - 2/14/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 2/8/2014 - 2/14/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
2/10/2014 7:30:00 AM	2/10/2014 4:00:00 PM	8.50	0.00	8.50
2/11/2014 7:30:00 AM	2/11/2014 4:00:00 PM	8.50	0.00	8.50
2/12/2014 7:30:00 AM	2/12/2014 4:00:00 PM	8.50	0.00	8.50
2/13/2014 7:30:00 AM	2/13/2014 4:00:00 PM	8.50	0.00	8.50
2/14/2014 7:30:00 AM	2/14/2014 4:00:00 PM	8.50	0.00	8.50
		42.50	0.00	42.50



**Employee Time Detail**

Period: 2/15/2014 - 2/21/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 2/15/2014 - 2/21/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
2/17/2014 7:30:00 AM	2/17/2014 4:00:00 PM	8.50	0.00	8.50
2/18/2014 7:30:00 AM	2/18/2014 1:00:00 PM	5.50	0.00	5.50
2/19/2014 8:00:00 AM	2/19/2014 3:50:00 PM	7.83	0.00	7.83
2/20/2014 7:20:00 AM	2/20/2014 4:00:00 PM	8.67	0.00	8.67
2/21/2014 7:20:00 AM	2/21/2014 3:50:00 PM	8.50	0.00	8.50
		39.00	0.00	39.00



2/21/2014 3:52:10 PM

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SNI 0047

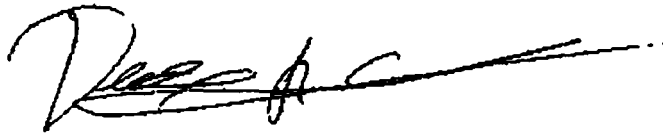
APP 304

**Employee Time Detail**

Period: 2/22/2014 - 2/28/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 2/22/2014 - 2/28/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
2/24/2014 7:30:00 AM	2/24/2014 2:30:00 PM	7.00	0.00	7.00
2/26/2014 7:30:00 AM	2/26/2014 12:00:00 PM	4.50	0.00	4.50
2/27/2014 7:30:00 AM	2/27/2014 3:00:00 PM	7.50	0.00	7.50
2/28/2014 7:30:00 AM	2/28/2014 4:00:00 PM	8.50	0.00	8.50
		27.50	0.00	27.50



2/28/2014 4:00:05 PM

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SNI 0048

APP 305

**Employee Time Detail**

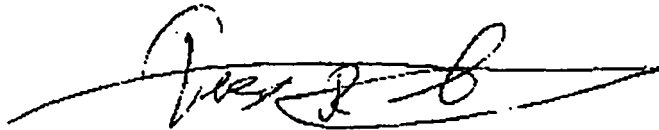
Period: 3/1/2014 -  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 3/1/2014 -

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
3/5/2014 7:20:00 AM	3/5/2014 3:50:00 PM	8.50	0.00	8.50
3/6/2014 7:20:00 AM	3/6/2014 4:00:00 PM	8.67	0.00	8.67
3/7/2014 7:20:00 AM	3/7/2014 3:50:00 PM	8.50	0.00	8.50
		25.67	0.00	25.67



3/7/2014 3:56:50 PM

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SNI 0049

APP 306

**Employee Time Detail**

Period: 3/8/2014 - 3/14/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 3/8/2014 - 3/14/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
3/11/2014 7:20:00 AM	3/11/2014 4:00:00 PM	8.67	0.00	8.67
3/12/2014 7:30:00 AM	3/12/2014 4:00:00 PM	8.50	0.00	8.50
3/13/2014 7:30:00 AM	3/13/2014 3:50:00 PM	8.33	0.00	8.33
3/14/2014 7:20:00 AM	3/14/2014 3:50:00 PM	8.50	0.00	8.50
		34.00	0.00	34.00



3/14/2014 3:52:55 PM

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APP 307

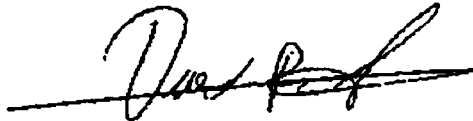
SNI 0050

**Employee Time Detail**

Period: 3/15/2014 - 3/21/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 3/15/2014 - 3/21/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
3/17/2014 8:10:00 AM	3/17/2014 4:00:00 PM	7.83	0.00	7.83
3/18/2014 7:30:00 AM	3/18/2014 4:00:00 PM	8.50	0.00	8.50
3/19/2014 7:30:00 AM	3/19/2014 4:00:00 PM	8.50	0.00	8.50
3/20/2014 7:30:00 AM	3/20/2014 4:00:00 PM	8.50	0.00	8.50
3/21/2014 8:10:00 AM	3/21/2014 4:00:00 PM	7.83	0.00	7.83
		41.16	0.00	41.16






**Employee Time Detail**

Period: 3/22/2014 - 3/28/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 3/22/2014 - 3/28/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
3/24/2014 7:30:00 AM	3/24/2014 4:10:00 PM	8.67	0.00	8.67
3/25/2014 7:30:00 AM	3/25/2014 4:10:00 PM	8.67	0.00	8.67
3/26/2014 7:30:00 AM	3/26/2014 4:00:00 PM	8.50	0.00	8.50
3/27/2014 7:30:00 AM	3/27/2014 4:00:00 PM	8.50	0.00	8.50
3/28/2014 7:30:00 AM	3/28/2014 4:10:00 PM	8.67	0.00	8.67
		43.01	0.00	43.01



## Employee Time Detail

Period: 3/29/2014 - 4/4/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 3/29/2014 - 4/4/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
3/31/2014 7:30:00 AM	3/31/2014 4:00:00 PM	8.50	0.00	8.50
4/2/2014 7:40:00 AM	4/2/2014 3:40:00 PM	8.00	0.00	8.00
4/4/2014 7:30:00 AM	4/4/2014 4:00:00 PM	8.50	0.00	8.50
		25.00	0.00	25.00



4/4/2014 3:54:45 PM

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## Employee Time Detail

Period: 4/5/2014 - 4/11/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 4/5/2014 - 4/11/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
4/8/2014 7:30:00 AM	4/8/2014 4:00:00 PM	8.50	0.00	8.50
4/9/2014 7:20:00 AM	4/9/2014 4:00:00 PM	8.67	0.00	8.67
4/10/2014 7:30:00 AM	4/10/2014 4:00:00 PM	8.50	0.00	8.50
4/11/2014 7:20:00 AM	4/11/2014 4:00:00 PM	8.67	0.00	8.67
		34.34	0.00	34.34



4/11/2014 3:57:51 PM

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SNI 0054

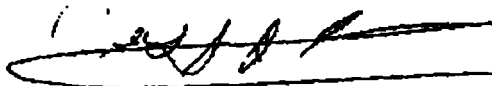
APP 311

**Employee Time Detail**

Period: 4/12/2014 - 4/18/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 4/12/2014 - 4/18/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
4/16/2014 7:50:00 AM	4/16/2014 4:00:00 PM	8.17	0.00	8.17
4/17/2014 7:30:00 AM	4/17/2014 4:00:00 PM	8.50	0.00	8.50
4/18/2014 7:20:00 AM	4/18/2014 3:50:00 PM	8.50	0.00	8.50
		25.17	0.00	25.17



4/18/2014 3:46:57 PM

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SNI 0055

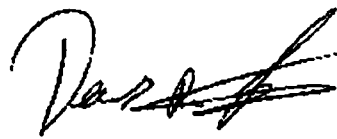
APP 312

## Employee Time Detail

Period: 4/19/2014 - 4/25/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 4/19/2014 - 4/25/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
4/22/2014 7:30:00 AM	4/22/2014 3:50:00 PM	8.33	0.00	8.33
4/23/2014 7:20:00 AM	4/23/2014 4:00:00 PM	8.67	0.00	8.67
4/25/2014 7:20:00 AM	4/25/2014 3:50:00 PM	8.50	0.00	8.50
		25.50	0.00	25.50



4/25/2014 3:53:57 PM

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APP 313

SNI 0056

# **Employee Time Detail**

Period: 4/28/2014 - 5/2/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 4/28/2014 - 5/2/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
4/29/2014 7:30:00 AM	4/29/2014 4:00:00 PM	8.50	0.00	8.50
4/30/2014 7:20:00 AM	4/30/2014 4:00:00 PM	8.67	0.00	8.67
5/2/2014 7:20:00 AM	5/2/2014 4:00:00 PM	8.67	0.00	8.67
		25.84	0.00	25.84



**Employee Time Detail**

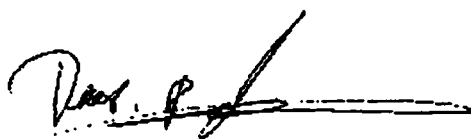
Period: 5/3/2014 - 5/9/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 5/3/2014 - 5/9/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
5/6/2014 7:20:00 AM	5/6/2014 4:00:00 PM	8.67	0.00	8.67
5/7/2014 7:20:00 AM	5/7/2014 4:00:00 PM	8.67	0.00	8.67
5/8/2014 7:20:00 AM	5/8/2014 4:00:00 PM	8.67	0.00	8.67
5/9/2014 7:40:00 AM	5/9/2014 4:00:00 PM	8.33	0.00	8.33
		34.34	0.00	34.34





**Employee Time Detail**

Period: 5/10/2014 - 5/16/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 5/10/2014 - 5/16/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
5/13/2014 7:20:00 AM	5/13/2014 4:00:00 PM	8.67	0.00	8.67
5/14/2014 7:30:00 AM	5/14/2014 4:00:00 PM	8.50	0.00	8.50
5/15/2014 7:30:00 AM	5/15/2014 4:00:00 PM	8.50	0.00	8.50
		25.67	0.00	25.67

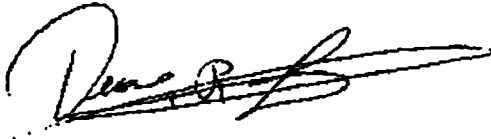


**Employee Time Detail**

Period: 5/17/2014 - 5/23/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 5/17/2014 - 5/23/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
5/20/2014 7:20:00 AM	5/20/2014 4:00:00 PM	8.67	0.00	8.67
5/21/2014 7:20:00 AM	5/21/2014 4:00:00 PM	8.67	0.00	8.67
5/22/2014 12:30:00 PM	5/22/2014 4:00:00 PM	3.50	0.00	3.50
5/23/2014 7:10:00 AM	5/23/2014 4:00:00 PM	8.83	0.00	8.83
		29.67	0.00	29.67



5/23/2014 4 01:09 PM

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SNI 0060

APP 317

**Employee Time Detail**

Period: 5/24/2014 - 5/30/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 5/24/2014 - 5/30/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>OVT Hours</u>	<u>Total Hours</u>
5/26/2014 7:30:00 AM	5/26/2014 2:00:00 PM	6.50	0.00	6.50
5/27/2014 7:30:00 AM	5/27/2014 4:00:00 PM	8.50	0.00	8.50
5/28/2014 7:30:00 AM	5/28/2014 4:00:00 PM	8.50	0.00	8.50
5/29/2014 10:00:00 AM	5/29/2014 4:00:00 PM	6.00	0.00	6.00
5/30/2014 7:30:00 AM	5/30/2014 3:40:00 PM	8.17	0.00	8.17
		37.67	0.00	37.67



**Employee Time Detail**

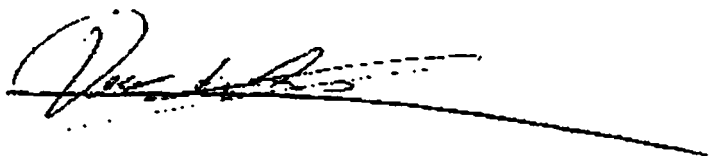
Period: 5/31/2014 -  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 5/31/2014 -

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
6/2/2014 7:30:00 AM	6/2/2014 4:00:00 PM	8.50	0.00	8.50
6/3/2014 7:30:00 AM	6/3/2014 4:00:00 PM	8.50	0.00	8.50
6/4/2014 7:30:00 AM	6/4/2014 4:00:00 PM	8.50	0.00	8.50
6/5/2014 7:30:00 AM	6/5/2014 4:00:00 PM	8.50	0.00	8.50
6/6/2014 7:30:00 AM	6/6/2014 4:00:00 PM	8.50	0.00	8.50
		42.50	0.00	42.50



**Employee Time Detail**

Period: 6/7/2014 - 6/13/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID:                      Name: Dimas Rodriguez                      Period: 6/7/2014 - 6/13/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
6/9/2014 7:40:00 AM	6/9/2014 4:10:00 PM	8.50	0.00	8.50
6/10/2014 7:20:00 AM	6/10/2014 4:00:00 PM	8.67	0.00	8.67
6/11/2014 7:20:00 AM	6/11/2014 4:00:00 PM	8.67	0.00	8.67
6/12/2014 7:30:00 AM	6/12/2014 4:10:00 PM	8.67	0.00	8.67
6/13/2014 7:20:00 AM	6/13/2014 4:00:00 PM	8.50	0.00	8.50
		43.01	0.00	43.01

*Dimas Rodriguez*

**Employee Time Detail**

Period: 6/14/2014 - 6/20/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 6/14/2014 - 6/20/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
6/16/2014 7:30:00 AM	6/16/2014 4:00:00 PM	8.50	0.00	8.50
6/17/2014 7:30:00 AM	6/17/2014 4:00:00 PM	8.50	0.00	8.50
6/18/2014 7:30:00 AM	6/18/2014 4:00:00 PM	8.50	0.00	8.50
6/19/2014 7:30:00 AM	6/19/2014 4:00:00 PM	8.50	0.00	8.50
6/20/2014 7:30:00 AM	6/20/2014 4:00:00 PM	8.50	0.00	8.50
		42.50	0.00	42.50



6/20/2014 3:59:05 PM

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SNI 0064

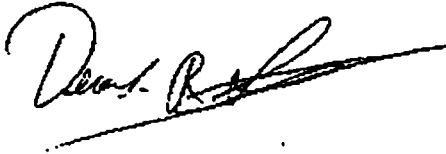
APP 321

## Employee Time Detail

Period: 6/21/2014 - 6/27/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 6/21/2014 - 6/27/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
6/24/2014 7:30:00 AM	6/24/2014 1:00:00 PM	5.50	0.00	5.50
6/25/2014 7:30:00 AM	6/25/2014 4:00:00 PM	8.50	0.00	8.50
6/26/2014 7:30:00 AM	6/26/2014 4:10:00 PM	8.67	0.00	8.67
6/27/2014 7:20:00 AM	6/27/2014 4:00:00 PM	8.67	0.00	8.67
		31.34	0.00	31.34






## Employee Time Detail

Period: 6/28/2014 - 7/3/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 6/28/2014 - 7/3/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
6/30/2014 7:30:00 AM	6/30/2014 4:00:00 PM	8.50	0.00	8.50
7/1/2014 7:20:00 AM	7/1/2014 4:00:00 PM	8.67	0.00	8.67
7/2/2014 7:30:00 AM	7/2/2014 4:00:00 PM	8.50	0.00	8.50
7/3/2014 7:20:00 AM	7/3/2014 4:00:00 PM	8.67	0.00	8.67
		34.34	0.00	34.34

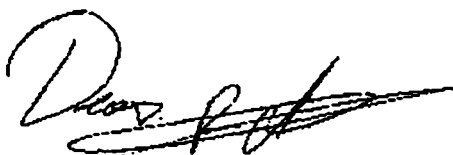


**Employee Time Detail**

Period: 7/5/2014 - 7/11/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 7/5/2014 - 7/11/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
7/7/2014 7:30:00 AM	7/7/2014 4:00:00 PM	8.50	0.00	8.50
7/8/2014 7:30:00 AM	7/8/2014 3:50:00 PM	8.33	0.00	8.33
7/10/2014 7:30:00 AM	7/10/2014 4:00:00 PM	8.50	0.00	8.50
7/11/2014 7:30:00 AM	7/11/2014 3:50:00 PM	8.33	0.00	8.33
		33.66	0.00	33.66



**Employee Time Detail**

Period: 7/12/2014 - 7/17/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 7/12/2014 - 7/17/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
7/14/2014 7:40:00 AM	7/14/2014 3:50:00 PM	8.17	0.00	8.17
7/15/2014 7:20:00 AM	7/15/2014 4:00:00 PM	8.67	0.00	8.67
7/16/2014 7:30:00 AM	7/16/2014 3:50:00 PM	8.33	0.00	8.33
7/17/2014 7:40:00 AM	7/17/2014 4:00:00 PM	8.33	0.00	8.33
		33.50	0.00	33.50



7/17/2014 3:58:49 PM

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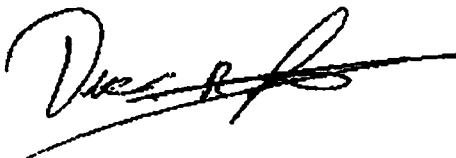
SNI 0068

**Employee Time Detail**

Period: 7/19/2014 - 7/25/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 7/19/2014 - 7/25/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
7/21/2014 7:30:00 AM	7/21/2014 4:00:00 PM	8.50	0.00	8.50
7/22/2014 7:20:00 AM	7/22/2014 3:50:00 PM	8.50	0.00	8.50
7/23/2014 7:20:00 AM	7/23/2014 4:00:00 PM	8.67	0.00	8.67
7/24/2014 7:20:00 AM	7/24/2014 4:00:00 PM	8.67	0.00	8.67
7/25/2014 7:30:00 AM	7/25/2014 4:00:00 PM	8.50	0.00	8.50
		42.84	0.00	42.84

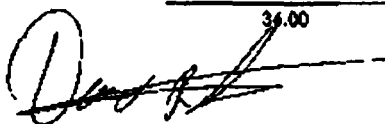


**Employee Time Detail**

Period: 7/26/2014 - 8/1/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 7/26/2014 - 8/1/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
7/28/2014 7:30:00 AM	7/28/2014 4:00:00 PM	8.50	0.00	8.50
7/29/2014 7:30:00 AM	7/29/2014 4:00:00 PM	8.50	0.00	8.50
7/30/2014 7:30:00 AM	7/30/2014 4:00:00 PM	8.50	0.00	8.50
7/31/2014 7:30:00 AM	7/31/2014 4:00:00 PM	8.50	0.00	8.50
		34.00	0.00	34.00

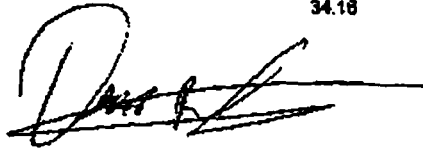


**Employee Time Detail**

Period: 8/16/2014 - 8/22/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 8/16/2014 - 8/22/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
8/18/2014 7:30:00 AM	8/18/2014 4:00:00 PM	8.50	0.00	8.50
8/19/2014 7:30:00 AM	8/19/2014 4:05:00 PM	8.58	0.00	8.58
8/20/2014 7:30:00 AM	8/20/2014 4:05:00 PM	8.58	0.00	8.58
8/21/2014 7:30:00 AM	8/21/2014 4:00:00 PM	8.50	0.00	8.50
		34.16	0.00	34.16

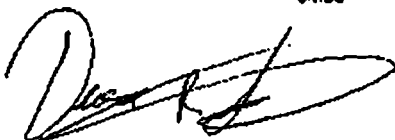


**Employee Time Detail**

Period: 8/23/2014 - 8/29/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 8/23/2014 - 8/29/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
8/26/2014 7:30:00 AM	8/26/2014 4:00:00 PM	8.50	0.00	8.50
8/27/2014 7:30:00 AM	8/27/2014 4:00:00 PM	8.50	0.00	8.50
8/28/2014 7:30:00 AM	8/28/2014 4:00:00 PM	8.50	0.00	8.50
8/29/2014 7:30:00 AM	8/29/2014 4:00:00 PM	8.50	0.00	8.50
		34.00	0.00	34.00



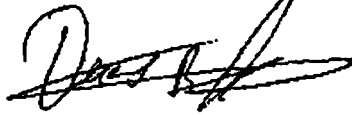


**Employee Time Detail**

Period: 8/30/2014 - 9/5/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 8/30/2014 - 9/5/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/1/2014 7:30:00 AM	9/1/2014 4:00:00 PM	8.50	0.00	8.50
9/2/2014 7:30:00 AM	9/2/2014 4:00:00 PM	8.50	0.00	8.50
9/3/2014 7:30:00 AM	9/3/2014 4:00:00 PM	8.50	0.00	8.50
9/4/2014 7:30:00 AM	9/4/2014 4:00:00 PM	8.50	0.00	8.50
9/5/2014 7:30:00 AM	9/5/2014 4:00:00 PM	8.00	2.50	8.50
		40.00	2.50	42.50

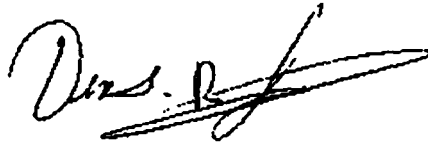


**Employee Time Detail**

Period: 9/6/2014 - 9/12/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 9/6/2014 - 9/12/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/9/2014 7:30:00 AM	9/9/2014 4:00:00 PM	8.50	0.00	8.50
9/10/2014 7:30:00 AM	9/10/2014 4:10:00 PM	8.67	0.00	8.67
9/11/2014 7:30:00 AM	9/11/2014 4:00:00 PM	8.50	0.00	8.50
9/12/2014 7:30:00 AM	9/12/2014 4:10:00 PM	8.67	0.00	8.67
		34.34	0.00	34.34

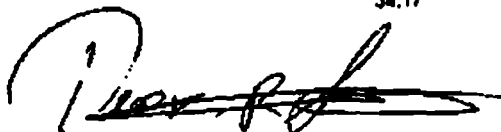


**Employee Time Detail**

Period: 9/13/2014 - 9/19/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 9/13/2014 - 9/19/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/16/2014 7:20:00 AM	9/16/2014 4:00:00 PM	8.67	0.00	8.67
9/17/2014 7:30:00 AM	9/17/2014 4:00:00 PM	8.50	0.00	8.50
9/18/2014 7:30:00 AM	9/18/2014 4:00:00 PM	8.50	0.00	8.50
9/19/2014 7:30:00 AM	9/19/2014 4:00:00 PM	8.50	0.00	8.50
		34.17	0.00	34.17

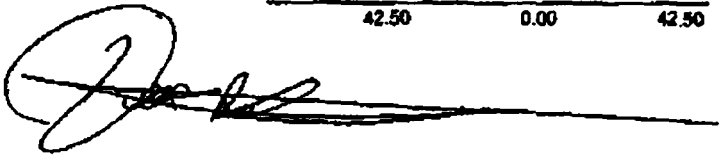


**Employee Time Detail**

Period: 9/20/2014 - 9/26/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 9/20/2014 - 9/26/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/22/2014 7:30:00 AM	9/22/2014 4:00:00 PM	8.50	0.00	8.50
9/23/2014 7:30:00 AM	9/23/2014 4:00:00 PM	8.50	0.00	8.50
9/24/2014 7:30:00 AM	9/24/2014 4:00:00 PM	8.50	0.00	8.50
9/25/2014 7:30:00 AM	9/25/2014 4:00:00 PM	8.50	0.00	8.50
9/26/2014 7:30:00 AM	9/26/2014 4:00:00 PM	8.50	0.00	8.50
		42.50	0.00	42.50



9/26/2014 4:00:15 PM

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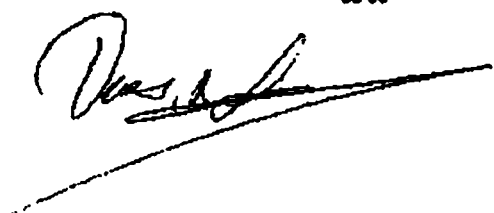
SNI 0076

**Employee Time Detail**

Period: 9/27/2014 - 10/3/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID:                      Name: Dimas Rodriguez                      Period: 9/27/2014 - 10/3/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/29/2014 7:30:00 AM	9/29/2014 4:00:00 PM	8.50	0.00	8.50
9/30/2014 7:30:00 AM	9/30/2014 4:00:00 PM	8.50	0.00	8.50
10/1/2014 7:30:00 AM	10/1/2014 11:30:00 AM	4.00	0.00	4.00
10/2/2014 7:30:00 AM	10/2/2014 4:00:00 PM	8.50	0.00	8.50
10/3/2014 7:30:00 AM	10/3/2014 4:00:00 PM	8.50	0.00	8.50
		38.00	0.00	38.00

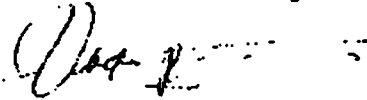


**Employee Time Detail**

Period: 10/4/2014 - 10/10/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 10/4/2014 - 10/10/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
10/8/2014 11:30:00 AM	10/8/2014 4:00:00 PM	4.50	0.00	4.50
10/9/2014 9:00:00 AM	10/9/2014 4:00:00 PM	7.00	0.00	7.00
10/10/2014 7:30:00 AM	10/10/2014 3:50:00 PM	8.33	0.00	8.33
		19.83	0.00	19.83



10/10/2014 3:55:30 PM

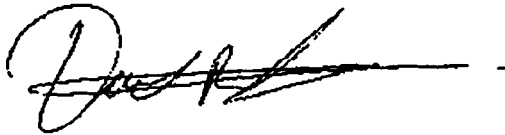
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**Employee Time Detail**

Period: 10/11/2014 - 10/17/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 10/11/2014 - 10/17/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
10/15/2014 7:40:00 AM	10/15/2014 3:50:00 PM	8.17	0.00	8.17
10/16/2014 7:30:00 AM	10/16/2014 4:00:00 PM	8.50	0.00	8.50
10/17/2014 7:30:00 AM	10/17/2014 3:40:00 PM	8.17	0.00	8.17
		24.84	0.00	24.84



10/17/2014 3:41:53 PM

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SNI 0079

**Employee Time Detail**

Period: 10/18/2014 - 10/24/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:**

**Name:** Dimas Rodriguez

**Period:** 10/18/2014 - 10/24/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
10/22/2014 7:20:00 AM	10/22/2014 4:00:00 PM	8.67	0.00	8.67
10/23/2014 7:30:00 AM	10/23/2014 4:00:00 PM	8.50	0.00	8.50
10/24/2014 7:30:00 AM	10/24/2014 4:00:00 PM	8.50	0.00	8.50
		25.67	0.00	25.67



10/24/2014 3:58:56 PM

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SNI 0080

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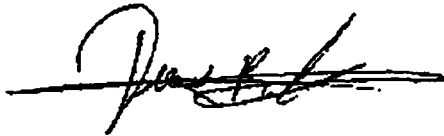


**Employee Time Detail**

Period: 10/25/2014 - 10/31/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 10/25/2014 - 10/31/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
10/29/2014 7:30:00 AM	10/29/2014 4:00:00 PM	8.50	0.00	8.50
10/30/2014 7:30:00 AM	10/30/2014 4:00:00 PM	8.50	0.00	8.50
10/31/2014 7:30:00 AM	10/31/2014 4:00:00 PM	8.50	0.00	8.50
		25.50	0.00	25.50



**Employee Time Detail**

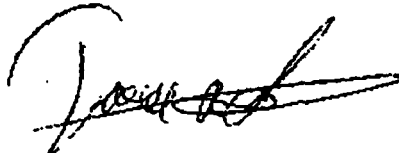
Period: 11/1/2014 - 11/7/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 11/1/2014 - 11/7/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
11/5/2014 7:20:00 AM	11/5/2014 4:00:00 PM	8.87	0.00	8.87
11/6/2014 7:20:00 AM	11/6/2014 4:00:00 PM	8.87	0.00	8.87
		17.34	0.00	17.34

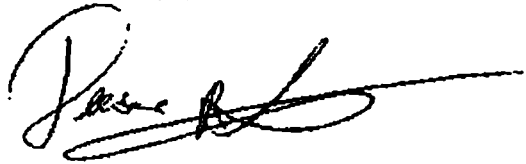


**Employee Time Detail**

Period: 11/8/2014 - 11/14/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 11/8/2014 - 11/14/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
11/12/2014 7:20:00 AM	11/12/2014 4:00:00 PM	8.67	0.00	8.67
11/13/2014 7:20:00 AM	11/13/2014 4:00:00 PM	8.67	0.00	8.67
11/14/2014 7:30:00 AM	11/14/2014 4:00:00 PM	8.50	0.00	8.50
		25.84	0.00	25.84

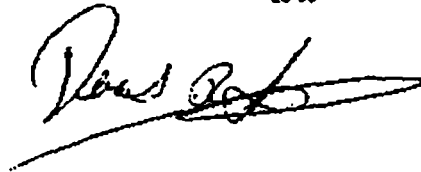


**Employee Time Detail**

Period: 11/15/2014 - 11/21/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 11/15/2014 - 11/21/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
11/19/2014 7:30:00 AM	11/19/2014 4:00:00 PM	8.50	0.00	8.50
11/20/2014 7:20:00 AM	11/20/2014 4:10:00 PM	8.83	0.00	8.83
11/21/2014 7:20:00 AM	11/21/2014 4:00:00 PM	8.67	0.00	8.67
		26.00	0.00	26.00



11/21/2014 4:01:00 PM

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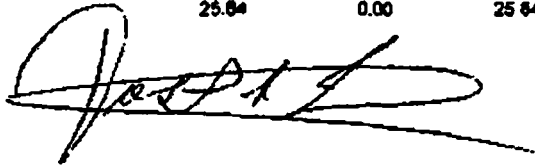
SNI 0084

**Employee Time Detail**

Period: 11/22/2014 - 11/28/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 11/22/2014 - 11/28/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
11/24/2014 7:30:00 AM	11/24/2014 4:10:00 PM	8.67	0.00	8.67
11/25/2014 7:30:00 AM	11/25/2014 4:10:00 PM	8.67	0.00	8.67
11/26/2014 7:30:00 AM	11/26/2014 4:00:00 PM	8.50	0.00	8.50
		25.84	0.00	25.84

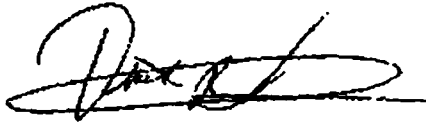


**Employee Time Detail**

Period: 11/29/2014 - 12/5/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 11/29/2014 - 12/5/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
12/3/2014 7:20:00 AM	12/3/2014 4:00:00 PM	8.67	0.00	8.67
12/4/2014 7:20:00 AM	12/4/2014 4:00:00 PM	8.67	0.00	8.67
12/5/2014 7:20:00 AM	12/5/2014 4:00:00 PM	8.67	0.00	8.67
		26.01	0.00	26.01

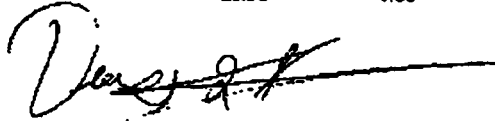


**Employee Time Detail**

Period: 12/6/2014 - 12/12/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 12/6/2014 - 12/12/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
12/10/2014 7:30:00 AM	12/10/2014 4:00:00 PM	8.50	0.00	8.50
12/11/2014 7:30:00 AM	12/11/2014 4:00:00 PM	8.50	0.00	8.50
12/12/2014 7:30:00 AM	12/12/2014 4:00:00 PM	8.50	0.00	8.50
		25.50	0.00	25.50



12/12/2014 4:01 33 PM

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SNI 0087

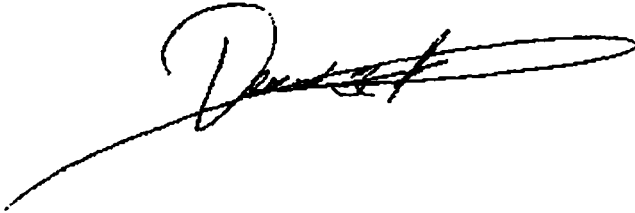
APP 344

**Employee Time Detail**

Period: 12/13/2014 - 12/19/2014  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 12/13/2014 - 12/19/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
12/16/2014 7:25:00 AM	12/16/2014 4:00:00 PM	8.58	0.00	8.58
12/17/2014 7:30:00 AM	12/17/2014 4:00:00 PM	8.50	0.00	8.50
12/18/2014 7:25:00 AM	12/18/2014 4:00:00 PM	8.58	0.00	8.58
12/19/2014 7:50:00 AM	12/19/2014 4:00:00 PM	8.17	0.00	8.17
		33.83	0.00	33.83



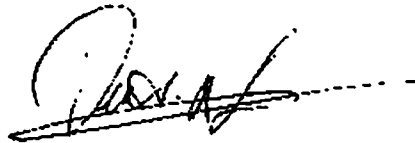


**Employee Time Detail**

Period: 12/20/2014 - 12/26/2014  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 12/20/2014 - 12/26/2014

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
12/22/2014 7:30:00 AM	12/22/2014 4:00:00 PM	8.50	0.00	8.50
12/23/2014 7:20:00 AM	12/23/2014 3:50:00 PM	8.50	0.00	8.50
12/24/2014 7:20:00 AM	12/24/2014 3:30:00 PM	8.17	0.00	8.17
		25.17	0.00	25.17



12/24/2014 3:27:27 PM

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SNI 0089

APP 346

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	320.00	1,600.00		40.00	8.00	320.00
Soc_Sec	-19.84	-99.20	Regular			
Medicare	-4.64	-23.20				
Advance	-295.52	-827.46				

Net Check: VOID Total 40.00 320.00  
 Pay Period Beginning: Feb 8, 2014 Check Date: 2/14/14  
 Pay Period Ending: Feb 14, 2014 Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 5440 MOHAWK CT  
 THE COLONY, TX 75056

Check Number: 2579

Feb 14, 2014

VOID

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

VOID  
 104.322  
 149.641  
 396.963  
 5000  
 153.963  
 -151.000  
 002.963

DIMAS RODRIGUES

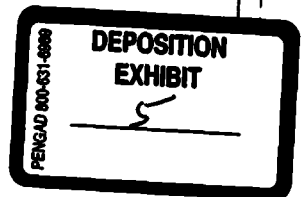
Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	320.00	1,600.00		40.00	8.00	320.00
Soc_Sec	-19.84	-99.20	Regular			
Medicare	-4.64	-23.20				
Advance	-295.52	-827.46				

Net Check: VOID Total 40.00 320.00  
 Pay Period Beginning: Feb 8, 2014 Check Date: 2/14/14  
 Pay Period Ending: Feb 14, 2014 Weeks in Pay Period: 1

Check Number: 2579



DIMAS RODRIGUES

Employee ID: ROD03

Social Sec. # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	224.00	4,964.00			
Soc_Sec	-13.89	-307.74 Regular	28.00	8.00	224.00
Medicare	-3.25	-71.95			
Advance		-1,900.00			

Net Check: \$206.86 Total 28.00 224.00

Pay Period Beginning: May 17, 2014

Check Date: 5/23/14

Pay Period Ending: May 23, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
5440 MOHAWK CT  
THE COLONY, TX 75056

Check Number: 2765

May 23, 2014

206.86

Two Hundred Six and 86/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	224.00	4,964.00			
Soc_Sec	-13.89	-307.74 Regular	28.00	8.00	224.00
Medicare	-3.25	-71.95			
Advance		-1,900.00			

Net Check: \$206.86 Total 28.00 224.00

Pay Period Beginning: May 17, 2014

Check Date: 5/23/14

Pay Period Ending: May 23, 2014

Weeks in Pay Period: 1

Check Number: 2765

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	288.00	5,252.00		36.00	8.00	288.00
Soc_Sec	-17.86	-325.60	Regular			
Medicare	-4.13	-76.13				
Advance		-1,900.00				

Net Check: \$265.96 Total 36.00 288.00  
 Pay Period Beginning: May 24, 2014 Check Date: 5/30/14  
 Pay Period Ending: May 30, 2014 Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 5440 MOHAWK CT  
 THE COLONY, TX 75056

Check Number: 2774

May 30, 2014

OTHER EMPLOYER

265.96

Two Hundred Sixty-Five and 96/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	288.00	5,252.00		36.00	8.00	288.00
Soc_Sec	-17.86	-325.60	Regular			
Medicare	-4.13	-76.13				
Advance		-1,900.00				

Net Check: \$265.96 Total 36.00 288.00

Pay Period Beginning: May 24, 2014

Check Date: 5/30/14

Pay Period Ending: May 30, 2014

Weeks in Pay Period: 1

Check Number: 2774

PL Docs 0003

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	5,572.00			
Soc_Sec	-19.84	-345.44 Regular	40.00	8.00	320.00
Medicare	-4.64	-80.77			
Advance	-100.00	-2,000.00			

Net Check: \$195.52 Total 40.00 320.00  
 Pay Period Beginning: May 31, 2014 Check Date: 6/6/14  
 Pay Period Ending: Jun 6, 2014 Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 5440 MOHAWK CT  
 THE COLONY, TX 75056

Check Number: 2785

Jun 6, 2014

195.52

One Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	5,572.00			
Soc_Sec	-19.84	-345.44 Regular	40.00	8.00	320.00
Medicare	-4.64	-80.77			
Advance	-100.00	-2,000.00			

Net Check: \$195.52 Total 40.00 320.00  
 Pay Period Beginning: May 31, 2014 Check Date: 6/6/14  
 Pay Period Ending: Jun 6, 2014 Weeks in Pay Period: 1

Check Number: 2785

PL Docs 0004

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date
Gross	320.00	5,892.00
Soc_Sec	-19.84	-365.28 Regular
Medicare	-4.64	-85.41
Advance	-100.00	-2,100.00

Hours	Rate	Total
40.00	8.00	320.00

Net Check: \$195.52

Total

40.00

320.00

Pay Period Beginning: Jun 7, 2014

Check Date: 6/13/14

Pay Period Ending: Jun 13, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
5440 MOHAWK CT  
THE COLONY, TX 75056

Check Number: 2792

Jun 13, 2014

195.52

One Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date
Gross	320.00	5,892.00
Soc_Sec	-19.84	-365.28 Regular
Medicare	-4.64	-85.41
Advance	-100.00	-2,100.00

Hours	Rate	Total
40.00	8.00	320.00

Net Check: \$195.52

Total

40.00

320.00

Pay Period Beginning: Jun 7, 2014

Check Date: 6/13/14

Pay Period Ending: Jun 13, 2014

Weeks in Pay Period: 1

Check Number: 2792

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	360.00	6,252.00		40.00	9.00	360.00
Soc_Sec	-22.32	-387.60	Regular			
Medicare	-5.22	-90.63				
Advance		-2,100.00				

Net Check: \$332.46 Total 40.00 360.00  
 Pay Period Beginning: Jun 14, 2014 Check Date: 6/20/14  
 Pay Period Ending: Jun 20, 2014 Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 5440 MOHAWK CT  
 THE COLONY, TX 75056

Check Number: 2799

Jun 20, 2014

332.46

Three Hundred Thirty-Two and 46/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	360.00	6,252.00		40.00	9.00	360.00
Soc_Sec	-22.32	-387.60	Regular			
Medicare	-5.22	-90.63				
Advance		-2,100.00				

Net Check: \$332.46 Total 40.00 360.00  
 Pay Period Beginning: Jun 14, 2014 Check Date: 6/20/14  
 Pay Period Ending: Jun 20, 2014 Weeks in Pay Period: 1

Check Number: 2799

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	261.00	6,513.00	29.00	9.00	261.00
Soc_Sec	-16.18	-403.78 Regular			
Medicare	-3.78	-94.41			
Advance		-2,100.00			

Net Check: \$241.04

Total

29.00

261.00

Pay Period Beginning: Jun 21, 2014

Check Date: 6/27/14

Pay Period Ending: Jun 27, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
5440 MOHAWK CT  
THE COLONY, TX 75056

Check Number: 2858

Jun 27, 2014

241.04

Two Hundred Forty-One and 04/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	261.00	6,513.00	29.00	9.00	261.00
Soc_Sec	-16.18	-403.78 Regular			
Medicare	-3.78	-94.41			
Advance		-2,100.00			

Net Check: \$241.04

Total

29.00

261.00

Pay Period Beginning: Jun 21, 2014

Check Date: 6/27/14

Pay Period Ending: Jun 27, 2014

Weeks in Pay Period: 1

Check Number: 2858



DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	288.00	6,801.00	32.00	9.00	288.00
Soc_Sec	-17.86	-421.64 Regular			
Medicare	-4.18	-98.59			
Advance		-2,100.00			

Net Check: \$265.96

Total

32.00

288.00

Pay Period Beginning: Jun 27, 2014

Check Date: 7/3/14

Pay Period Ending: Jul 3, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
5440 MOHAWK CT  
THE COLONY, TX 75056

Check Number: 070414-4

Jul 3, 2014

2866

265.96

Two Hundred Sixty-Five and 96/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	288.00	6,801.00	32.00	9.00	288.00
Soc_Sec	-17.86	-421.64 Regular			
Medicare	-4.18	-98.59			
Advance		-2,100.00			

Net Check: \$265.96

Total

32.00

288.00

Pay Period Beginning: Jun 27, 2014

Check Date: 7/3/14

Pay Period Ending: Jul 3, 2014

Weeks in Pay Period: 1

Check Number: 070414-4

PL Date 0008

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	288.00	7,089.00			
Soc_Sec	-17.86	-439.50 Regular	32.00	9.00	288.00
Medicare	-4.18	-102.77			
Advance	-100.00	-2,200.00			

Net Check: \$165.96 Total 32.00 288.00

Pay Period Beginning: Jul 5, 2014

Check Date: 7/11/14

Pay Period Ending: Jul 11, 2014

Weeks in Pay Period: 1

SHAN HANKEEN, INC  
5440 MOHAWK CT  
THE COLONY, TX 75056

Check Number: 2873

Jul 11, 2014

165.96

One Hundred Sixty-Five and 96/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	288.00	7,089.00			
Soc_Sec	-17.86	-439.50 Regular	32.00	9.00	288.00
Medicare	-4.18	-102.77			
Advance	-100.00	-2,200.00			

Net Check: \$165.96 Total 32.00 288.00

Pay Period Beginning: Jul 5, 2014

Check Date: 7/11/14

Pay Period Ending: Jul 11, 2014

Weeks in Pay Period: 1

Check Number: 2873

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PL Docs 0009

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	288.00	7,377.00	32.00	9.00	288.00
Soc_Sec	-17.86	-457.36 Regular			
Medicare	-4.18	-106.95			
Advance	-100.00	-2,300.00			

Net Check: \$165.96 Total 32.00 288.00  
 Pay Period Beginning: Jul 12, 2014 Check Date: 7/18/14  
 Pay Period Ending: Jul 18, 2014 Weeks in Pay Period: 1

SPAN NAMKEEN, INC  
 5440 MOHAWK CT  
 THE COLONY, TX 75056

Check Number: 2837

Jul 18, 2014

165.96

One Hundred Sixty-Five and 96/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	288.00	7,377.00	32.00	9.00	288.00
Soc_Sec	-17.86	-457.36 Regular			
Medicare	-4.18	-106.95			
Advance	-100.00	-2,300.00			

Net Check: \$165.96 Total 32.00 288.00  
 Pay Period Beginning: Jul 12, 2014 Check Date: 7/18/14  
 Pay Period Ending: Jul 18, 2014 Weeks in Pay Period: 1

Check Number: 2837

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	360.00	7,737.00				
Soc_Sec	-22.32	-479.68	Regular	40.00	9.00	360.00
Medicare	-5.22	-112.17				
Advance	-100.00	-2,400.00				

Net Check:	\$232.46	Total	40.00	360.00
Pay Period Beginning: Jul 19, 2014		Check Date: 7/25/14		
Pay Period Ending: Jul 25, 2014		Weeks in Pay Period: 1		

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 2844

Jul 25, 2014

232.46

Two Hundred Thirty-Two and 46/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	360.00	7,737.00				
Soc_Sec	-22.32	-479.68	Regular	40.00	9.00	360.00
Medicare	-5.22	-112.17				
Advance	-100.00	-2,400.00				

Net Check:	\$232.46	Total	40.00	360.00
Pay Period Beginning: Jul 19, 2014		Check Date: 7/25/14		
Pay Period Ending: Jul 25, 2014		Weeks in Pay Period: 1		

Check Number: 2844

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	288.00	8,025.00			
Soc_Sec	-17.86	-497.54 Regular	32.00	9.00	288.00
Medicare	-4.18	-116.35			
Advance	-100.00	-2,500.00			

Net Check: \$165.96 Total 32.00 288.00

Pay Period Beginning: Jul 26, 2014

Check Date: 8/1/14

Pay Period Ending: Aug 1, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 2884

Aug 1, 2014

165.96

One Hundred Sixty-Five and 96/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	288.00	8,025.00			
Soc_Sec	-17.86	-497.54 Regular	32.00	9.00	288.00
Medicare	-4.18	-116.35			
Advance	-100.00	-2,500.00			

Net Check: \$165.96 Total 32.00 288.00

Pay Period Beginning: Jul 26, 2014

Check Date: 8/1/14

Pay Period Ending: Aug 1, 2014

Weeks in Pay Period: 1

Check Number: 2884

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	288.00	9,609.00		32.00	9.00	288.00
Soc_Sec	-17.86	-595.76	Regular			
Medicare	-4.18	-139.33				
Advance		-2,500.00				

Net Check: \$265.96 Total 32.00 288.00  
 Pay Period Beginning: Sep 13, 2014 Check Date: 9/19/14  
 Pay Period Ending: Sep 19, 2014 Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 2937

Sep 19, 2014

265.96

Two Hundred Sixty-Five and 96/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	288.00	9,609.00		32.00	9.00	288.00
Soc_Sec	-17.86	-595.76	Regular			
Medicare	-4.18	-139.33				
Advance		-2,500.00				

Net Check: \$265.96 Total 32.00 288.00  
 Pay Period Beginning: Sep 13, 2014 Check Date: 9/19/14  
 Pay Period Ending: Sep 19, 2014 Weeks in Pay Period: 1  
 Check Number: 2937



DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	400.00	10,009.00				
Fed_Income	-0.96	-0.96 Regular		40.00	10.00	400.00
Soc_Sec	-24.80	-620.56				
Medicare	-5.80	-145.13				
Advance		-2,500.00				

Net Check: \$368.44 Total 40.00 400.00

Pay Period Beginning: Sep 20, 2014

Check Date: 9/26/14

Pay Period Ending: Sep 26, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 2944

Sep 26, 2014

368.44

Three Hundred Sixty-Eight and 44/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	400.00	10,009.00				
Fed_Income	-0.96	-0.96 Regular		40.00	10.00	400.00
Soc_Sec	-24.80	-620.56				
Medicare	-5.80	-145.13				
Advance		-2,500.00				

Net Check: \$368.44 Total 40.00 400.00

Pay Period Beginning: Sep 20, 2014

Check Date: 9/26/14

Pay Period Ending: Sep 26, 2014

Weeks in Pay Period: 1

Check Number: 2944

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	380.00	10,389.00				
Fed_Income		-0.96 Regular		38.00	10.00	380.00
Soc_Sec	-23.56	-644.12				
Medicare	-5.51	-150.64				
Advance		-2,500.00				

Net Check: \$350.93 Total 38.00 380.00  
 Pay Period Beginning: Sep 27, 2014 Check Date: 10/3/14  
 Pay Period Ending: Oct 3, 2014 Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 2954

Oct 3, 2014

350.93

Three Hundred Fifty and 93/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	380.00	10,389.00				
Fed_Income		-0.96 Regular		38.00	10.00	380.00
Soc_Sec	-23.56	-644.12				
Medicare	-5.51	-150.64				
Advance		-2,500.00				

Net Check: \$350.93 Total 38.00 380.00  
 Pay Period Beginning: Sep 27, 2014 Check Date: 10/3/14  
 Pay Period Ending: Oct 3, 2014 Weeks in Pay Period: 1

Check Number: 2954



DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	240.00	10,814.00		24.00	10.00	240.00
Fed_Income		-0.96 Regular				
Soc_Sec	-14.88	-670.47				
Medicare	-3.48	-156.80				
Advance		-2,500.00				

Net Check: \$221.64 Total 24.00 240.00

Pay Period Beginning: Oct 11, 2014

Check Date: 10/17/14

Pay Period Ending: Oct 17, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 2965

Oct 17, 2014

221.64

Two Hundred Twenty-One and 64/100 Dollars

DIMAS RODRIGUES

12879 S JOSEY LN 170

FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	240.00	10,814.00		24.00	10.00	240.00
Fed_Income		-0.96 Regular				
Soc_Sec	-14.88	-670.47				
Medicare	-3.48	-156.80				
Advance		-2,500.00				

Net Check: \$221.64 Total 24.00 240.00

Pay Period Beginning: Oct 11, 2014

Check Date: 10/17/14

Pay Period Ending: Oct 17, 2014

Weeks in Pay Period: 1

Check Number: 2965

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	240.00	11,054.00	24.00	10.00	240.00
Fed_Income		-0.96 Regular			
Soc_Sec	-14.88	-685.35			
Medicare	-3.48	-160.28			
Advance		-2,500.00			

Net Check: \$221.64 Total 24.00 240.00

Pay Period Beginning: Oct 18, 2014

Check Date: 10/24/14

Pay Period Ending: Oct 24, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 2970

Oct 24, 2014

221.64

Two Hundred Twenty-One and 64/100 Dollars

DIMAS RODRIGUES

12879 S JOSEY LN 170

FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	240.00	11,054.00	24.00	10.00	240.00
Fed_Income		-0.96 Regular			
Soc_Sec	-14.88	-685.35			
Medicare	-3.48	-160.28			
Advance		-2,500.00			

Net Check: \$221.64 Total 24.00 240.00

Pay Period Beginning: Oct 18, 2014

Check Date: 10/24/14

Pay Period Ending: Oct 24, 2014

Weeks in Pay Period: 1

Check Number: 2970

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	240.00	11,934.00			
Fed_Income		-0.96 Regular	24.00	10.00	240.00
Soc_Sec	-14.88	-739.91			
Medicare	-3.48	-173.04			
Advance	-50.00	-2,650.00			

Net Check: - \$171.64

Total

24.00

240.00

Pay Period Beginning: Nov 15, 2014

Check Date: 11/21/14

Pay Period Ending: Nov 21, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 2996

Nov 21, 2014

171.64

One Hundred Seventy-One and 64/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	240.00	11,934.00			
Fed_Income		-0.96 Regular	24.00	10.00	240.00
Soc_Sec	-14.88	-739.91			
Medicare	-3.48	-173.04			
Advance	-50.00	-2,650.00			

Net Check: - \$171.64

Total

24.00

240.00

Pay Period Beginning: Nov 15, 2014

Check Date: 11/21/14

Pay Period Ending: Nov 21, 2014

Weeks in Pay Period: 1

Check Number: 2996

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	240.00	12,654.00	24.00	10.00	240.00
Fed_Income		-0.96 Regular			
Soc_Sec	-14.88	-784.55			
Medicare	-3.48	-183.48			
Advance	-50.00	-2,750.00			

Net Check:	\$171.64	Total	24.00	240.00
Pay Period Beginning:	Dec 6, 2014	Check Date:	12/12/14	
Pay Period Ending:	Dec 12, 2014	Weeks in Pay Period:	1	

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 2823

Dec 12, 2014

171.64

One Hundred Seventy-One and 64/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	240.00	12,654.00	24.00	10.00	240.00
Fed_Income		-0.96 Regular			
Soc_Sec	-14.88	-784.55			
Medicare	-3.48	-183.48			
Advance	-50.00	-2,750.00			

Net Check:	\$171.64	Total	24.00	240.00
Pay Period Beginning:	Dec 6, 2014	Check Date:	12/12/14	
Pay Period Ending:	Dec 12, 2014	Weeks in Pay Period:	1	

Check Number: 2823



DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	12,974.00	32.00	10.00	320.00
Fed_Income		-0.96 Regular			
Soc_Sec	-19.84	-804.39			
Medicare	-4.64	-188.12			
Advance	-50.00	-2,800.00			

Net Check: \$245.52

Total

32.00

320.00

Pay Period Beginning: Dec 13, 2014

Check Date: 12/19/14

Pay Period Ending: Dec 19, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3528

Dec 19, 2014

245.52

Two Hundred Forty-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	12,974.00	32.00	10.00	320.00
Fed_Income		-0.96 Regular			
Soc_Sec	-19.84	-804.39			
Medicare	-4.64	-188.12			
Advance	-50.00	-2,800.00			

Net Check: \$245.52

Total

32.00

320.00

Pay Period Beginning: Dec 13, 2014

Check Date: 12/19/14

Pay Period Ending: Dec 19, 2014

Weeks in Pay Period: 1

Check Number: 3528

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	340.00	13,314.00				
Fed_Income		-0.96	Regular	24.00	10.00	240.00
Soc_Sec	-21.08	-825.47	Bonus	100.00	1.00	100.00
Medicare	-4.93	-193.05				
Advance	-50.00	-2,850.00				

Net Check: \$263.99 Total 124.00 340.00

Pay Period Beginning: Dec 20, 2014

Check Date: 12/26/14

Pay Period Ending: Dec 26, 2014

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3534

Dec 26, 2014

263.99

Two Hundred Sixty-Three and 99/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	340.00	13,314.00				
Fed_Income		-0.96	Regular	24.00	10.00	240.00
Soc_Sec	-21.08	-825.47	Bonus	100.00	1.00	100.00
Medicare	-4.93	-193.05				
Advance	-50.00	-2,850.00				

Net Check: \$263.99 Total 124.00 340.00

Pay Period Beginning: Dec 20, 2014

Check Date: 12/26/14

Pay Period Ending: Dec 26, 2014

Weeks in Pay Period: 1

Check Number: 3534

a Employee's SSN	1 Wages, tips, other compensation	2 Federal income tax withheld
OMB No. 1545-0008	3 Social security wages	4 Social security tax withheld
b Employer identification number	5 Medicare wages and tips	6 Medicare tax withheld
c Employee's name, address, and ZIP code	SHAN NAMKEEN, INC 2731 NATIONAL CIRCLE SUITE 101 GARLAND TX 75041	
e Employee's first name and initial	Last name	Suff.
DIMAS	RODRIGUES	
12879 S JOSEY LN 170 FARMERS BRANCH TX 75234		
f Employee's address and Zip code		
d Control number	7 Social security tips	8 Allocated tips
9	10 Dependent care benefits	11 Nonqualified plans
12a	14 Other	
12b		
12c		
12d		
13 Statutory employee <input type="checkbox"/>	Retirement plan <input type="checkbox"/>	Third-party sick pay <input type="checkbox"/>
15 State Employer's state ID number	16 State wages, tips, etc.	17 State income tax
18 Local wages, tips, etc.	19 Local income tax	20 Locality name

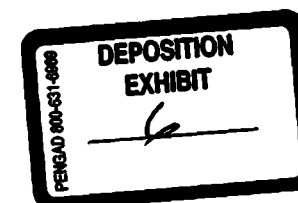
Form **W-2** Wage and Tax Statement **2014** Copy C - For EMPLOYEE'S RECORDS.

This information is being furnished to the Internal Revenue Service. If you are required to file a tax return, a negligence penalty or other sanction may be imposed on you if this income is taxable and you fail to report it.

a Employee's SSN	1 Wages, tips, other compensation	2 Federal income tax withheld
OMB No. 1545-0008	3 Social security wages	4 Social security tax withheld
b Employer identification number	5 Medicare wages and tips	6 Medicare tax withheld
c Employee's name, address, and ZIP code	SHAN NAMKEEN, INC 2731 NATIONAL CIRCLE SUITE 101 GARLAND TX 75041	
e Employee's first name and initial	Last name	Suff.
DIMAS	RODRIGUES	
12879 S JOSEY LN 170 FARMERS BRANCH TX 75234		
f Employee's address and Zip code		
d Control number	7 Social security tips	8 Allocated tips
9	10 Dependent care benefits	11 Nonqualified plans
12a	14 Other	
12b		
12c		
12d		
13 Statutory employee <input type="checkbox"/>	Retirement plan <input type="checkbox"/>	Third-party sick pay <input type="checkbox"/>
15 State Employer's state ID number	16 State wages, tips, etc.	17 State income tax
18 Local wages, tips, etc.	19 Local income tax	20 Locality name

Form **W-2** Wage and Tax Statement **2014** Department of Treasury-Internal Revenue Service  
Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return.

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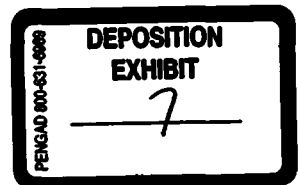
## SHAN NAMKEEN, INC

## Payroll Register

For the Period From Jan 1, 2014 to Dec 31, 2014

Filter Criteria includes 1) Employee IDs ROD03 Report order is by Check Date Report is printed in Detail Format.

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hr	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_E	Medi FUT
ROD03 DIMAS RODRIGUES XXX-XX-1175 2579 1/3/14	Regular	24.00	8.00	192.00	177.32	192.00 -1.04	-11.90	-11.90 -2.78	-2.78 -1.15
ROD03 DIMAS RODRIGUES XXX-XX-1175 2584 1/10/14	Regular	16.00	8.00	128.00	118.20	128.00 -0.69	-7.94	-7.94 -1.86	-1.86 -0.77
ROD03 DIMAS RODRIGUES XXX-XX-1175 2591 1/17/14	Regular	32.00	8.00	256.00	236.42	256.00 -1.38	-15.87	-15.87 -3.71	-3.71 -1.54
ROD03 DIMAS RODRIGUES XXX-XX-1175 2595 1/25/14	Regular	16.00	8.00	128.00	118.20	128.00 -0.69	-7.94	-7.94 -1.86	-1.86 -0.77
ROD03 DIMAS RODRIGUES XXX-XX-1175 0000 1/31/14	Regular	40.00	8.00	320.00		320.00 -295.52	-19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 0000 2/7/14	Regular	32.00	8.00	256.00		256.00 -236.42	-15.87	-15.87 -3.71	-3.71 -1.54
ROD03 DIMAS RODRIGUES XXX-XX-1175 0000 2/14/14	Regular	40.00	8.00	320.00		320.00 -295.52	-19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 2634 2/21/14	Regular	40.00	8.00	320.00	122.98	320.00 -172.54	-19.84	-19.84 -4.64	-4.64 -1.92





## SHAN NAMKEEN, INC

## Payroll Register

For the Period From Jan 1, 2014 to Dec 31, 2014

Filter Criteria includes 1) Employee IDs ROD03 Report order is by Check Date Report is printed in Detail Format

Employee ID	Pay Type	Pay Hr	Rate	Pay Amt	Amount	Gross Advance	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_E	Medi FUT
Employee Masked SS No Reference Date						SUI_ER			
ROD03 DIMAS RODRIGUES XXX-XX-1175 2643 2/28/14	Regular	27.50	8.00	220.00	203.17	220.00 -1.19	-13.64	-13.64 -3.19	-3.19 -1.32
ROD03 DIMAS RODRIGUES XXX-XX-1175 2650 3/7/14	Regular	24.00	8.00	192.00	177.32	192.00 -1.04	-11.90	-11.90 -2.78	-2.78 -1.15
ROD03 DIMAS RODRIGUES XXX-XX-1175 2657 3/14/14	Regular	32.00	8.00	256.00	36.42	256.00 -200.00	-15.87	-15.87 -3.71	-3.71 -1.54
ROD03 DIMAS RODRIGUES XXX-XX-1175 2663 3/21/14	Regular	40.00	8.00	320.00	95.52	320.00 -200.00	-19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 2671 3/28/14	Regular	40.00	8.00	320.00	295.52	320.00 -1.73	-19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 2612 4/4/14	Regular	29.00	8.00	232.00	14.26	232.00 -200.00	-14.38	-14.38 -3.36	-3.36 -1.39
ROD03 DIMAS RODRIGUES XXX-XX-1175 2617 4/11/14	Regular	32.00	8.00	256.00	236.42	256.00 -1.38	-15.87	-15.87 -3.71	-3.71 -1.54
ROD03 DIMAS RODRIGUES XXX-XX-1175 2622 4/18/14	Regular	24.00	8.00	192.00	77.32	192.00 -100.00	-11.90	-11.90 -2.78	-2.78 -1.15

## SHAN NAMKEEN, INC

## Payroll Register

For the Period From Jan 1, 2014 to Dec 31, 2014

Filter Criteria includes 1) Employee IDs ROD03 Report order is by Check Date Report is printed in Detail Format.

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hr	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_E	Medi FUT
ROD03 DIMAS RODRIGUES XXX-XX-1175 2677 4/25/14	Regular	24.00	8.00	192.00	77.32	192.00 -100.00  -1.04	-11.90	-11.90 -2.78	-2.78 -1.15
ROD03 DIMAS RODRIGUES XXX-XX-1175 2687 5/2/14	Regular	24.00	8.00	192.00	177.32	192.00  -1.04	-11.90	-11.90 -2.78	-2.78 -1.15
ROD03 DIMAS RODRIGUES XXX-XX-1175 2693 5/9/14	Regular	32.00	8.00	256.00	136.42	256.00 -100.00  -1.38	-15.87	-15.87 -3.71	-3.71 -1.54
ROD03 DIMAS RODRIGUES XXX-XX-1175 2698 5/15/14	Regular	24.00	8.00	192.00	177.32	192.00 -1.04 -11.90	-11.90	-11.90 -2.78	-2.78 -1.15
ROD03 DIMAS RODRIGUES XXX-XX-1175 2765 5/23/14	Regular	28.00	8.00	224.00	206.86	224.00 -1.21 -13.89	-13.89	-13.89 -3.25	-3.25 -1.34
ROD03 DIMAS RODRIGUES XXX-XX-1175 2773 5/30/14	Regular	36.00	8.00	288.00	265.96	288.00 -1.56 -17.86	-17.86	-17.86 -4.18	-4.18 -1.73
ROD03 DIMAS RODRIGUES XXX-XX-1175 2785 6/6/14	Regular	40.00	8.00	320.00	195.52	320.00 -100.00  -1.73	-19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 2792 6/13/14	Regular	40.00	8.00	320.00	195.52	320.00 -100.00  -1.73	-19.84	-19.84 -4.64	-4.64 -1.92

## SHAN NAMKEEN, INC

## Payroll Register

For the Period From Jan 1, 2014 to Dec 31, 2014

Filter Criteria includes 1) Employee IDs ROD03 Report order is by Check Date Report is printed in Detail Format

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hr	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_E	Medi FUT
ROD03 DIMAS RODRIGUES XXX-XX-1175 2799 6/20/14	Regular	40.00	9.00	360.00	332.46	360.00 -1.94	-22.32	-22.32 -5.22	-5.22
ROD03 DIMAS RODRIGUES XXX-XX-1175 2858 6/27/14	Regular	29.00	9.00	261.00	241.04	261.00 -1.41	-16.18	-16.18 -3.78	-3.78
ROD03 DIMAS RODRIGUES XXX-XX-1175 2866 7/3/14	Regular	32.00	9.00	288.00	265.96	288.00 -1.56	-17.86	-17.86 -4.18	-4.18
ROD03 DIMAS RODRIGUES XXX-XX-1175 2873 7/11/14	Regular	32.00	9.00	288.00	165.96	288.00 -100.00 -1.56	-17.86	-17.86 -4.18	-4.18
ROD03 DIMAS RODRIGUES XXX-XX-1175 2837 7/18/14	Regular	32.00	9.00	288.00	165.96	288.00 -100.00 -1.56	-17.86	-17.86 -4.18	-4.18
ROD03 DIMAS RODRIGUES XXX-XX-1175 2844 7/25/14	Regular	40.00	9.00	360.00	232.46	360.00 -100.00 -1.94	-22.32	-22.32 -5.22	-5.22
ROD03 DIMAS RODRIGUES XXX-XX-1175 2884 8/1/14	Regular	32.00	9.00	288.00	165.96	288.00 -100.00 -1.56	-17.86	-17.86 -4.18	-4.18
ROD03 DIMAS RODRIGUES XXX-XX-1175 2903 8/22/14	Regular	40.00	9.00	360.00	332.46	360.00 -1.94	-22.32	-22.32 -5.22	-5.22

**SHAN NAMKEEN, INC**  
**Payroll Register**

**For the Period From Jan 1, 2014 to Dec 31, 2014**

Filter Criteria includes 1) Employee IDs ROD03 Report order is by Check Date. Report is printed in Detail Format

Employee ID	Pay Type	Pay Hr	Rate	Pay Amt	Amount	Gross Advance	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_E	Medi FUT
Employee Masked SS No Reference Date									
ROD03 DIMAS RODRIGUES XXX-XX-1175 2908 8/29/14	Regular	32.00	9.00	288.00	265.96	288.00 -1.56	-17.86	-17.86 -4.18	-4.18
ROD03 DIMAS RODRIGUES XXX-XX-1175 2920 9/5/14	Regular	40.00	9.00	360.00	332.46	360.00 -1.77	-22.32	-22.32 -5.22	-5.22
ROD03 DIMAS RODRIGUES XXX-XX-1175 2930 9/12/14	Regular	32.00	9.00	288.00	265.96	288.00	-17.86	-17.86 -4.18	-4.18
ROD03 DIMAS RODRIGUES XXX-XX-1175 2937 9/19/14	Regular	32.00	9.00	288.00	265.96	288.00	-17.86	-17.86 -4.18	-4.18
ROD03 DIMAS RODRIGUES XXX-XX-1175 2944 9/26/14	Regular	40.00	10.00	400.00	368.44	400.00	-0.96 -24.80	-24.80 -5.80	-5.80
ROD03 DIMAS RODRIGUES XXX-XX-1175 2954 10/3/14	Regular	38.00	10.00	380.00	350.93	380.00	-23.56	-23.56 -5.51	-5.51
ROD03 DIMAS RODRIGUES XXX-XX-1175 2960 10/10/14	Regular	18.50	10.00	185.00	170.85	185.00	-11.47	-11.47 -2.68	-2.68
ROD03 DIMAS RODRIGUES XXX-XX-1175 2965 10/17/14	Regular	24.00	10.00	240.00	221.64	240.00	-14.88	-14.88 -3.48	-3.48

## SHAN NAMKEEN, INC

## Payroll Register

For the Period From Jan 1, 2014 to Dec 31, 2014

Filter Criteria includes 1) Employee IDs ROD03 Report order is by Check Date Report is printed in Detail Format.

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hr	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_E	Medi FUT
ROD03 DIMAS RODRIGUES XXX-XX-1175 2970  10/24/14	Regular	24.00	10.00	240.00	221.64	240.00	-14.88	-14.88 -3.48	-3.48
ROD03 DIMAS RODRIGUES XXX-XX-1175 2981  10/31/14	Regular	24.00	10.00	240.00	221.64	240.00	-14.88	-14.88 -3.48	-3.48
ROD03 DIMAS RODRIGUES XXX-XX-1175 2985  11/7/14	Regular	16.00	10.00	160.00	147.76	160.00	-9.92	-9.92 -2.32	-2.32
ROD03 DIMAS RODRIGUES XXX-XX-1175 2991  11/14/14	Regular	24.00	10.00	240.00	121.64	240.00 -100.00	-14.88	-14.88 -3.48	-3.48
ROD03 DIMAS RODRIGUES XXX-XX-1175 2996  11/21/14	Regular	24.00	10.00	240.00	171.64	240.00 -50.00	-14.88	-14.88 -3.48	-3.48
ROD03 DIMAS RODRIGUES XXX-XX-1175 2808  11/28/14	Regular	24.00	10.00	240.00	221.64	240.00	-14.88	-14.88 -3.48	-3.48
ROD03 DIMAS RODRIGUES XXX-XX-1175 2817  12/5/14	Regular	24.00	10.00	240.00	171.64	240.00 -50.00	-14.88	-14.88 -3.48	-3.48
ROD03 DIMAS RODRIGUES XXX-XX-1175 2823  12/12/14	Regular	24.00	10.00	240.00	171.64	240.00 -50.00	-14.88	-14.88 -3.48	-3.48

12/8/15 at 14:29:15 26

CONFIDENTIAL

APP 374

SHAN NAMKEEN, INC  
Payroll Register

For the Period From Jan 1, 2014 to Dec 31, 2014

Filter Criteria includes 1) Employee IDs ROD03 Report order is by Check Date Report is printed in Detail Format

Employee ID	Pay Type	Pay Hr	Rate	Pay Amt	Amount	Gross Advance	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_E	Medi FUT
Employee Masked SS No Reference Date						SUI_ER			
ROD03 DIMAS RODRIGUES XXX-XX-1175 3528 12/19/14	Regular	32.00	10.00	320.00	245.52	320.00 -50.00	-19.84	-19.84 -4.64	-4.64
ROD03 DIMAS RODRIGUES XXX-XX-1175 3534 12/26/14	Regular Bonus	24.00 100.00	10.00	240.00 100.00	263.99	340.00 -50.00	-21.08	-21.08 -4.93	-4.93

**Shan Namkeen, Inc. Payroll Confirmation Record and Release Agreement**

I, DIMAS RODRIGUEZ, do hereby state that I am employed with Shan Namkeen, Inc. doing general production work and at times I complete cleaning and other labor tasks as needed.

I am paid at the rate of \$7.25/hour and have been paid at the rate of \$7.25/hour since the inception of my employment with Shan Namkeen, Inc.

My average work week is 32 to 40 hours per week depending on the workload.

I have been paid in full for all hours worked by me since the inception of my employment with Shan Namkeen, Inc. I have no wage and hour, minimum wage, overtime wage, or any other claims whatsoever against Shan Namkeen, Inc. I understand that I am paid minimum wage as required by law, and that I have worked any overtime and as such I am entitled to the time and a half calculation for any number of hours since the inception of my employment with Shan Namkeen, Inc. has been paid in full. I understand that I have had the opportunity to present any claims that I currently believe I have, if any, against Shan Namkeen, Inc. for wage and hour, minimum wage, overtime wage issues, or any other claims, to my supervisor at Shan Namkeen, Inc.

I affirmatively state that I have no claims whatsoever against Shan Namkeen, Inc. or its agents, directors, officers, or any of my direct supervisors as of the date of signing of this Payroll Confirmation Record and Release.

In the event that I later find that I have claims, known or unknown against Shan Namkeen, Inc., in exchange for the consideration provided to me by Shan Namkeen, Inc. as set forth herein below, I release waive, convey and assign any and all possible claims arising from or related to my employment through the date of execution of this Agreement. Such released claims include, but are not limited to, claims for personal injuries and economic loss; claims for wages or benefits (e.g. vacation, sick days, personal days, short term disability, long term disability, pension or welfare benefits); claims pursuant to state or federal laws prohibiting discrimination/harassment/retaliation/whistleblowing; claims pursuant to Chapters 21,61, and 451 of the Texas Labor Code claims for breach of contract; tort claims; and any and all other claims, state or federal, statutory or common law, legal, equitable or declaratory, from the beginning of time through the date of execution of this Agreement.

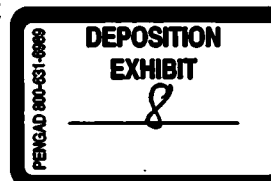
I have accepted consideration as follows from Shan Namkeen, Inc. in exchange for the releases set forth by me herein:

Shan Namkeen, Inc. has agreed to:

1. To give the me a good reference on separation from employment provided that I have not conducted myself in a manner that would justify termination for cause; and
2. Pay me a one time bonus in the amount of \$100.

Payroll Confirmation Record and Release Agreement  
Confidential – Shan Namkeen, Inc.

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CONFIDENTIAL  
APP 376

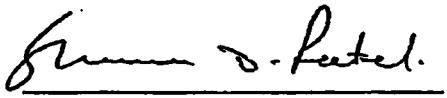
SNI 0003

Shan Namkeen, Inc. has agreed to the above consideration in exchange for any and all releases of claims known or unknown that I may hold against Shan Namkeen, Inc. from the beginning of time through the date of this agreement. Mine, and Shan Namkeen, Inc.'s undersatnding and acceptance of this agreement by the signatures of myself DIMAS RODRIGUEZ and of Shan Namkeen, Inc. herein below.

Understood, Accepted, and Agreed.

  
Employee, DIMAS RODRIGUEZ

10/9/15  
Date

  
Shailesh Patel, for Shan Namkeen, Inc.

10/09/2015  
Date

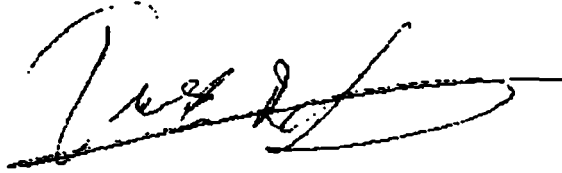


# Employee Time Detail

Period: 12/27/2014 - 1/2/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 12/27/2014 - 1/2/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
12/29/2014 7:30:00 AM	12/29/2014 3:50:00 PM	8.33	0.00	8.33
12/30/2014 7:30:00 AM	12/30/2014 4:00:00 PM	8.50	0.00	8.50
12/31/2014 7:20:00 AM	12/31/2014 4:00:00 PM	8.67	0.00	8.67
1/2/2015 7:30:00 AM	1/2/2015 4:00:00 PM	8.50	0.00	8.50
		34.00	0.00	34.00




1/6/2015 1:25:45 PM

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CONFIDENTIAL

SNI 0090

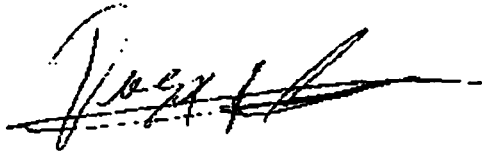
APP 378

**Employee Time Detail**

Period: 1/3/2015 - 1/9/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 1/3/2015 - 1/9/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
1/5/2015 7:30:00 AM	1/5/2015 4:00:00 PM	8.50	0.00	8.50
1/6/2015 8:10:00 AM	1/6/2015 4:30:00 PM	8.33	0.00	8.33
1/7/2015 7:30:00 AM	1/7/2015 4:00:00 PM	8.50	0.00	8.50
1/8/2015 7:30:00 AM	1/8/2015 4:00:00 PM	8.50	0.00	8.50
		33.83	0.00	33.83



1/16/2015 1:31:40 PM

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CONFIDENTIAL

SNI 0091

APP 379

## Employee Time Detail

Period: 1/10/2015 - 1/16/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 1/10/2015 - 1/16/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
1/13/2015 7:30:00 AM	1/13/2015 4:00:00 PM	8.50	0.00	8.50
1/14/2015 7:20:00 AM	1/14/2015 4:10:00 PM	8.83	0.00	8.83
1/15/2015 7:30:00 AM	1/15/2015 4:00:00 PM	8.50	0.00	8.50
1/16/2015 7:30:00 AM	1/16/2015 4:00:00 PM	8.50	0.00	8.50
		34.33	0.00	34.33

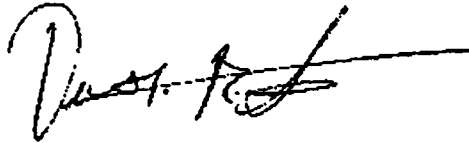


**Employee Time Detail**

Period: 1/17/2015 - 1/23/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 1/17/2015 - 1/23/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
1/19/2015 7:30:00 AM	1/19/2015 4:00:00 PM	8.50	0.00	8.50
1/20/2015 7:20:00 AM	1/20/2015 4:00:00 PM	8.67	0.00	8.67
1/21/2015 7:50:00 AM	1/21/2015 4:00:00 PM	8.17	0.00	8.17
1/22/2015 7:30:00 AM	1/22/2015 4:00:00 PM	8.50	0.00	8.50
		33.84	0.00	33.84



1/30/2015 9:11:42 AM

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SNI 0093

APP 381

**Employee Time Detail**

Period: 1/24/2015 - 1/30/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 1/24/2015 - 1/30/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
1/27/2015 7:30:00 AM	1/27/2015 4:00:00 PM	8.50	0.00	8.50
1/28/2015 7:30:00 AM	1/28/2015 4:00:00 PM	8.50	0.00	8.50
1/29/2015 7:30:00 AM	1/29/2015 4:00:00 PM	8.50	0.00	8.50
1/30/2015 7:30:00 AM	1/30/2015 4:10:00 PM	8.67	0.00	8.67
		34.17	0.00	34.17



1/30/2015 4:08:21 PM

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SNI 0094

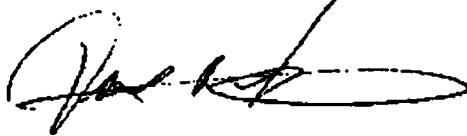
APP 382

# Employee Time Detail

Period: 1/31/2015 - 2/6/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 1/31/2015 - 2/6/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
2/3/2015 7:20:00 AM	2/3/2015 3:50:00 PM	8.50	0.00	8.50
2/4/2015 7:30:00 AM	2/4/2015 4:00:00 PM	8.50	0.00	8.50
2/5/2015 7:30:00 AM	2/5/2015 4:00:00 PM	8.50	0.00	8.50
2/6/2015 7:20:00 AM	2/6/2015 4:00:00 PM	8.67	0.00	8.67
		34.17	0.00	34.17

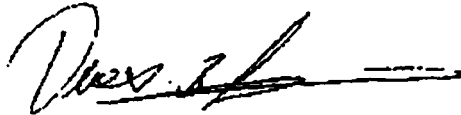


**Employee Time Detail**

Period: 2/7/2015 - 2/13/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 2/7/2015 - 2/13/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
2/11/2015 7:30:00 AM	2/11/2015 4:00:00 PM	8.50	0.00	8.50
2/12/2015 7:20:00 AM	2/12/2015 3:50:00 PM	8.50	0.00	8.50
2/13/2015 7:20:00 AM	2/13/2015 4:00:00 PM	8.67	0.00	8.67
		25.67	0.00	25.67



2/13/2015 4:02:07 PM

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SNI 0096

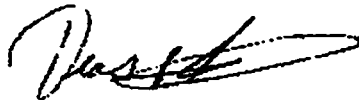
APP 384

**Employee Time Detail**

Period: 2/21/2015 - 2/27/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 2/21/2015 - 2/27/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
2/25/2015 7:20:00 AM	2/25/2015 4:00:00 PM	8.67	0.00	8.67
2/26/2015 7:20:00 AM	2/26/2015 4:00:00 PM	8.67	0.00	8.67
2/27/2015 7:20:00 AM	2/27/2015 3:50:00 PM	8.50	0.00	8.50
		25.84	0.00	25.84



2/27/2015 3:54:35 PM

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SNI 0097

APP 385



**Employee Time Detail**

Period: 2/28/2015 - 3/6/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dinas Rodriguez Period: 2/28/2015 - 3/6/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
3/4/2015 7:20:00 AM	3/4/2015 3:50:00 PM	8.50	0.00	8.50
3/6/2015 10:30:00 AM	3/6/2015 4:00:00 PM	5.50	0.00	5.50
		14.00	0.00	14.00



3/6/2015 4:03:51 PM

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SNI 0098

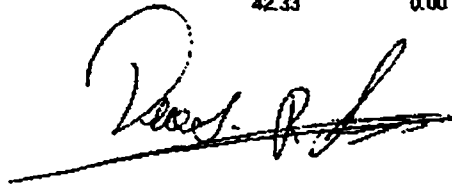
APP 386

**Employee Time Detail**

Period: 3/7/2015 - 3/13/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 3/7/2015 - 3/13/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
3/9/2015 7:50:00 AM	3/9/2015 4:10:00 PM	8.33	0.00	8.33
3/10/2015 7:30:00 AM	3/10/2015 4:00:00 PM	8.50	0.00	8.50
3/11/2015 7:30:00 AM	3/11/2015 4:00:00 PM	8.50	0.00	8.50
3/12/2015 7:30:00 AM	3/12/2015 4:00:00 PM	8.50	0.00	8.50
3/13/2015 7:20:00 AM	3/13/2015 4:00:00 PM	8.50	0.00	8.50
		42.33	0.00	42.33

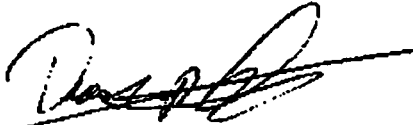


**Employee Time Detail**

Period: 3/14/2015 - 3/20/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 3/14/2015 - 3/20/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
3/17/2015 7:20:00 AM	3/17/2015 4:00:00 PM	8.67	0.00	8.67
3/18/2015 7:20:00 AM	3/18/2015 3:50:00 PM	8.50	0.00	8.50
3/19/2015 7:20:00 AM	3/19/2015 4:00:00 PM	8.67	0.00	8.67
3/20/2015 7:20:00 AM	3/20/2015 3:50:00 PM	8.50	0.00	8.50
		34.34	0.00	34.34



3/20/2015 3:53:48 PM

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CONFIDENTIAL

SNI 0100

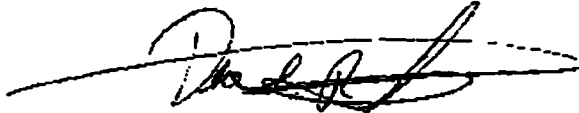
APP 388

**Employee Time Detail**

Period: 3/21/2015 - 3/27/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 3/21/2015 - 3/27/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
3/24/2015 8:10:00 AM	3/24/2015 4:00:00 PM	7.83	0.00	7.83
3/25/2015 7:20:00 AM	3/25/2015 4:00:00 PM	8.67	0.00	8.67
3/26/2015 7:20:00 AM	3/26/2015 3:50:00 PM	8.50	0.00	8.50
3/27/2015 7:20:00 AM	3/27/2015 4:00:00 PM	8.67	0.00	8.67
		33.67	0.00	33.67



3/27/2015 3:58:58 PM

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SNI 0101

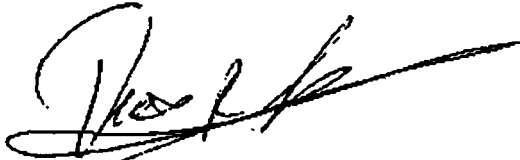
APP 389

**Employee Time Detail**

Period: 3/28/2015 - 4/3/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimes Rodriguez Period: 3/28/2015 - 4/3/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
3/31/2015 7:20:00 AM	3/31/2015 4:10:00 PM	8.83	0.00	8.83
4/1/2015 7:30:00 AM	4/1/2015 4:00:00 PM	8.50	0.00	8.50
4/2/2015 7:20:00 AM	4/2/2015 4:00:00 PM	8.67	0.00	8.67
4/3/2015 7:20:00 AM	4/3/2015 4:00:00 PM	8.67	0.00	8.67
		34.67	0.00	34.67



4/3/2015 3:59:32 PM

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SNI 0102

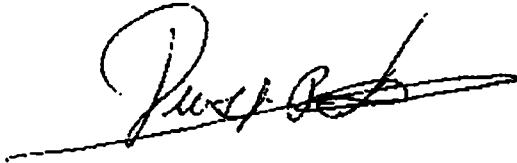
APP 390

**Employee Time Detail**

Period: 4/4/2015 - 4/10/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 4/4/2015 - 4/10/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
4/7/2015 7:20:00 AM	4/7/2015 4:00:00 PM	8.67	0.00	8.67
4/8/2015 7:30:00 AM	4/8/2015 4:00:00 PM	8.50	0.00	8.50
4/9/2015 7:20:00 AM	4/9/2015 3:50:00 PM	8.50	0.00	8.50
4/10/2015 7:20:00 AM	4/10/2015 3:50:00 PM	8.50	0.00	8.50
		34.17	0.00	34.17



**Employee Time Detail**

Period: 4/11/2015 - 4/17/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 4/11/2015 - 4/17/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
4/14/2015 7:20:00 AM	4/14/2015 3:50:00 PM	8.50	0.00	8.50
4/15/2015 7:20:00 AM	4/15/2015 3:50:00 PM	8.50	0.00	8.50
4/16/2015 7:20:00 AM	4/16/2015 4:00:00 PM	8.67	0.00	8.67
4/17/2015 7:10:00 AM	4/17/2015 3:50:00 PM	8.67	0.00	8.67
		34.34	0.00	34.34

*See R. Lopez* 4/29/15

**Employee Time Detail**

Period: 4/18/2015 - 4/24/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 4/18/2015 - 4/24/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
4/21/2015 7:20:00 AM	4/21/2015 4:00:00 PM	8.67	0.00	8.67
4/22/2015 7:20:00 AM	4/22/2015 4:00:00 PM	8.67	0.00	8.67
4/23/2015 7:20:00 AM	4/23/2015 3:50:00 PM	8.50	0.00	8.50
4/24/2015 7:20:00 AM	4/24/2015 4:00:00 PM	8.67	0.00	8.67
		34.51	0.00	34.51

*[Handwritten Signature]*

4/29/15



**Employee Time Detail**

Period: 4/25/2015 - 5/1/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 4/25/2015 - 5/1/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
4/28/2015 7:20:00 AM	4/28/2015 4:00:00 PM	8.67	0.00	8.67
4/29/2015 7:20:00 AM	4/29/2015 4:00:00 PM	8.67	0.00	8.67
4/30/2015 7:40:00 AM	4/30/2015 3:50:00 PM	8.17	0.00	8.17
5/1/2015 7:20:00 AM	5/1/2015 3:50:00 PM	8.50	0.00	8.50
		34.01	0.00	34.01



**Employee Time Detail**

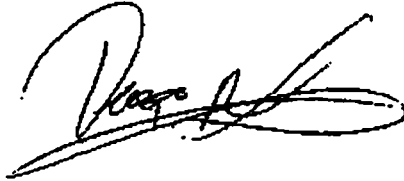
Period: 5/2/2015 - 5/8/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 5/2/2015 - 5/8/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
5/5/2015 7:20:00 AM	5/5/2015 4:00:00 PM	8.67	0.00	8.67
5/6/2015 7:20:00 AM	5/6/2015 4:00:00 PM	8.67	0.00	8.67
5/7/2015 7:10:00 AM	5/7/2015 4:00:00 PM	8.83	0.00	8.83
5/8/2015 7:20:00 AM	5/8/2015 4:00:00 PM	8.67	0.00	8.67
		34.84	0.00	34.84



**Employee Time Detail**

Period: 5/9/2015 - 5/15/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 5/9/2015 - 5/15/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
5/11/2015 7:20:00 AM	5/11/2015 4:00:00 PM	8.67	0.00	8.67
5/12/2015 7:20:00 AM	5/12/2015 4:00:00 PM	8.67	0.00	8.67
5/13/2015 7:10:00 AM	5/13/2015 4:00:00 PM	8.83	0.00	8.83
5/14/2015 7:20:00 AM	5/14/2015 4:00:00 PM	8.67	0.00	8.67
5/15/2015 7:30:00 AM	5/15/2015 4:00:00 PM	8.50	0.00	8.50
		43.34	0.00	43.34



5/15/2015 4:07:37 PM

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SNI 0108

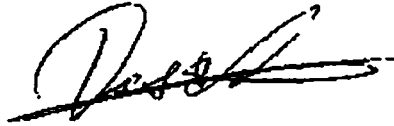
APP 396

**Employee Time Detail**

Period: 5/16/2015 - 5/22/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 5/16/2015 - 5/22/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
5/18/2015 7:40:00 AM	5/18/2015 4:00:00 PM	8.33	0.00	8.33
5/20/2015 7:30:00 AM	5/20/2015 3:50:00 PM	8.33	0.00	8.33
5/21/2015 7:30:00 AM	5/21/2015 4:00:00 PM	8.50	0.00	8.50
		25.16	0.00	25.16

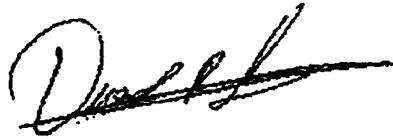


**Employee Time Detail**

Period: 5/23/2015 - 5/29/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 5/23/2015 - 5/29/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
5/25/2015 7:30:00 AM	5/25/2015 4:00:00 PM	8.50	0.00	8.50
5/26/2015 7:30:00 AM	5/26/2015 4:00:00 PM	8.50	0.00	8.50
5/27/2015 7:20:00 AM	5/27/2015 4:00:00 PM	8.67	0.00	8.67
5/28/2015 7:10:00 AM	5/28/2015 3:50:00 PM	8.67	0.00	8.67
5/29/2015 7:30:00 AM	5/29/2015 4:00:00 PM	8.50	0.00	8.50
		42.84	0.00	42.84

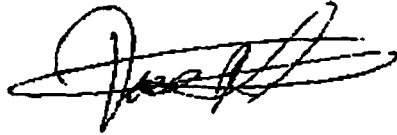


**Employee Time Detail**

Period: 5/30/2015 - 6/5/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 5/30/2015 - 6/5/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
6/1/2015 7:10:00 AM	6/1/2015 4:00:00 PM	8.83	0.00	8.83
6/2/2015 7:10:00 AM	6/2/2015 4:00:00 PM	8.83	0.00	8.83
6/3/2015 7:10:00 AM	6/3/2015 4:00:00 PM	8.83	0.00	8.83
6/4/2015 7:10:00 AM	6/4/2015 4:00:00 PM	8.83	0.00	8.83
6/5/2015 7:20:00 AM	6/5/2015 4:00:00 PM	8.67	0.00	8.67
		<u>43.99</u>	<u>0.00</u>	<u>43.99</u>

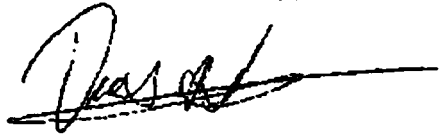


**Employee Time Detail**

Period: 6/6/2015 - 6/12/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 6/6/2015 - 6/12/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
6/8/2015 6:30:00 AM	6/8/2015 4:10:00 PM	9.67	0.00	9.67
6/9/2015 6:30:00 AM	6/9/2015 4:10:00 PM	9.67	0.00	9.67
6/10/2015 6:30:00 AM	6/10/2015 3:50:00 PM	9.33	0.00	9.33
6/11/2015 6:10:00 AM	6/11/2015 4:00:00 PM	9.83	0.00	9.83
6/12/2015 6:30:00 AM	6/12/2015 4:00:00 PM	9.57	0.00	9.57
		48.07	0.00	48.07

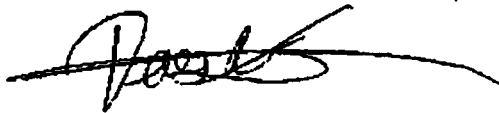


**Employee Time Detail**

Period: 6/13/2015 - 6/19/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 6/13/2015 - 6/19/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
6/15/2015 6:30:00 AM	6/15/2015 4:00:00 PM	9.50	0.00	9.50
6/16/2015 6:30:00 AM	6/16/2015 4:00:00 PM	9.50	0.00	9.50
6/17/2015 6:20:00 AM	6/17/2015 4:00:00 PM	9.67	0.00	9.67
6/19/2015 6:10:00 AM	6/19/2015 4:00:00 PM	9.83	0.00	9.83
		38.50	0.00	38.50



6/19/2015 4:02:15 PM

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SNI 0113

APP 401

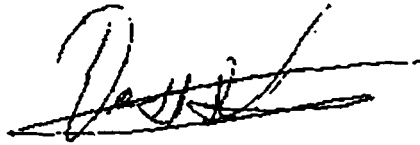


**Employee Time Detail**

Period: 6/20/2015 - 6/26/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 6/20/2015 - 6/26/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
6/22/2015 6:20:00 AM	6/22/2015 4:00:00 PM	9.67	0.00	9.67
6/23/2015 6:20:00 AM	6/23/2015 4:00:00 PM	9.67	0.00	9.67
6/24/2015 6:10:00 AM	6/24/2015 3:50:00 PM	9.67	0.00	9.67
6/25/2015 7:30:00 AM	6/25/2015 4:00:00 PM	8.50	0.00	8.50
6/26/2015 6:20:00 AM	6/26/2015 4:00:00 PM	8.50	0.00	8.50
		46.01	0.00	46.01

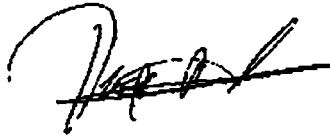


**Employee Time Detail**

Period: 6/27/2015 - 7/3/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 6/27/2015 - 7/3/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
6/29/2015 6:20:00 AM	6/29/2015 3:50:00 PM	9.50	0.00	9.50
6/30/2015 6:10:00 AM	6/30/2015 3:50:00 PM	9.67	0.00	9.67
7/1/2015 6:20:00 AM	7/1/2015 3:50:00 PM	9.50	0.00	9.50
7/2/2015 6:30:00 AM	7/2/2015 4:00:00 PM	9.50	0.00	9.50
7/3/2015 6:30:00 AM	7/3/2015 4:00:00 PM	9.50	0.00	9.50
		47.67	0.00	47.67



7/3/2015 3:59:05 PM

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SNI 0115

APP 403

**Employee Time Detail**

Period: 7/4/2015 - 7/10/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID:                      Name: Dimas Rodriguez                      Period: 7/4/2015 - 7/10/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
7/6/2015 7:50:00 AM	7/6/2015 4:10:00 PM	8.33	0.00	8.33
7/7/2015 6:10:00 AM	7/7/2015 4:00:00 PM	9.83	0.00	9.83
7/8/2015 6:20:00 AM	7/8/2015 4:00:00 PM	9.67	0.00	9.67
7/9/2015 6:20:00 AM	7/9/2015 4:00:00 PM	9.67	0.00	9.67
7/10/2015 6:10:00 AM	7/10/2015 4:00:00 PM	9.83	0.00	9.83
		47.33	0.00	47.33



7/10/2015 4:01:13 PM

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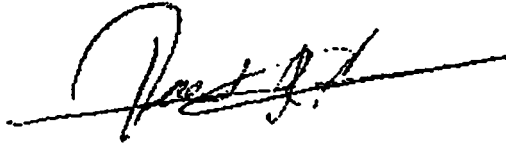
SNI 0116

**Employee Time Detail**

Period: 7/11/2015 - 7/17/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 7/11/2015 - 7/17/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
7/14/2015 7:20:00 AM	7/14/2015 4:00:00 PM	8.67	0.00	8.67
7/15/2015 6:20:00 AM	7/15/2015 4:00:00 PM	9.67	0.00	9.67
7/16/2015 6:20:00 AM	7/16/2015 8:50:00 AM	2.50	0.00	2.50
7/16/2015 9:50:00 AM	7/16/2015 3:50:00 PM	8.00	0.00	8.00
		26.84	0.00	26.84



7/17/2015 3:53:35 PM

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SNI 0117

APP 405

**Employee Time Detail**

Period: 7/18/2015 - 7/24/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 7/18/2015 - 7/24/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
7/21/2015 8:10:00 AM	7/21/2015 4:00:00 PM	7.83	0.00	7.83
7/22/2015 7:40:00 AM	7/22/2015 4:00:00 PM	8.33	0.00	8.33
7/23/2015 7:40:00 AM	7/23/2015 4:00:00 PM	8.33	0.00	8.33
7/24/2015 7:30:00 AM	7/24/2015 4:00:00 PM	8.50	0.00	8.50
		32.99	0.00	32.99



7/24/2015 3:56:07 PM

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SNI 0118

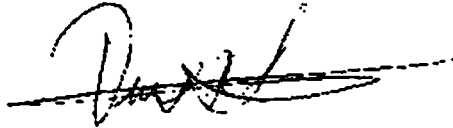
APP 406

**Employee Time Detail**

Period: 7/25/2015 - 7/31/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 7/25/2015 - 7/31/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
7/28/2015 7:30:00 AM	7/28/2015 3:50:00 PM	8.33	0.00	8.33
7/29/2015 7:30:00 AM	7/29/2015 4:00:00 PM	8.50	0.00	8.50
7/30/2015 7:30:00 AM	7/30/2015 4:00:00 PM	8.50	0.00	8.50
7/31/2015 8:30:00 AM	7/31/2015 4:00:00 PM	7.50	0.00	7.50
		32.83	0.00	32.83



7/31/2015 4:06:40 PM

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SNI 0119

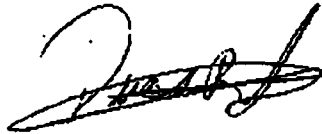
APP 407

**Employee Time Detail**

Period: 8/1/2015 - 8/7/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 8/1/2015 - 8/7/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
8/4/2015 7:30:00 AM	8/4/2015 3:50:00 PM	8.33	0.00	8.33
8/5/2015 7:30:00 AM	8/5/2015 3:50:00 PM	8.33	0.00	8.33
8/6/2015 7:30:00 AM	8/6/2015 3:50:00 PM	8.33	0.00	8.33
8/7/2015 7:30:00 AM	8/7/2015 2:50:00 PM	7.33	0.00	7.33
		32.32	0.00	32.32



8/7/2015 4:03:06 PM

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SNI 0120

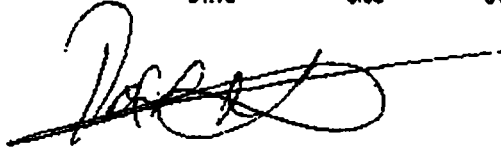
APP 408

**Employee Time Detail**

Period: 8/8/2015 - 8/14/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 8/8/2015 - 8/14/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
8/11/2015 7:30:00 AM	8/11/2015 3:30:00 PM	8.00	0.00	8.00
8/12/2015 7:20:00 AM	8/12/2015 3:40:00 PM	8.33	0.00	8.33
8/13/2015 7:30:00 AM	8/13/2015 5:00:00 PM	9.50	0.00	9.50
8/14/2015 7:20:00 AM	8/14/2015 3:40:00 PM	8.33	0.00	8.33
		34.16	0.00	34.16



8/21/2015 10:37:48 AM

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SNI 0121

APP 409



**Employee Time Detail**

Period: 8/15/2015 - 8/21/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 8/15/2015 - 8/21/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
8/18/2015 7:30:00 AM	8/18/2015 3:50:00 PM	8.33	0.00	8.33
8/19/2015 7:20:00 AM	8/19/2015 4:00:00 PM	8.67	0.00	8.67
8/20/2015 7:30:00 AM	8/20/2015 4:00:00 PM	8.50	0.00	8.50
8/21/2015 7:30:00 AM	8/21/2015 4:00:00 PM	8.50	0.00	8.50
		34.00	0.00	34.00



8/21/2015 3:59:37 PM

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SNI 0122

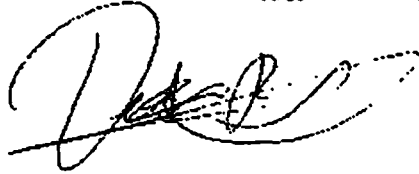
APP 410

**Employee Time Detail**

Period: 8/22/2015 - 8/28/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 8/22/2015 - 8/28/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
8/25/2015 7:30:00 AM	8/25/2015 4:00:00 PM	8.50	0.00	8.50
8/26/2015 7:30:00 AM	8/26/2015 4:00:00 PM	8.50	0.00	8.50
8/27/2015 7:30:00 AM	8/27/2015 3:50:00 PM	8.33	0.00	8.33
8/28/2015 7:30:00 AM	8/28/2015 4:00:00 PM	8.50	0.00	8.50
		33.83	0.00	33.83



8/28/2015 4:00:25 PM

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SNI 0123

APP 411

**Employee Time Detail**

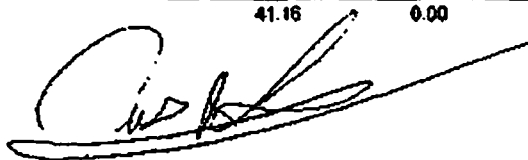
Period: 8/29/2015 - 9/4/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 8/29/2015 - 9/4/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
8/31/2015 8:20:00 AM	8/31/2015 3:50:00 PM	7.50	0.00	7.50
9/1/2015 7:30:00 AM	9/1/2015 3:50:00 PM	8.33	0.00	8.33
9/2/2015 7:30:00 AM	9/2/2015 3:50:00 PM	8.33	0.00	8.33
9/3/2015 7:30:00 AM	9/3/2015 4:00:00 PM	8.50	0.00	8.50
9/4/2015 7:30:00 AM	9/4/2015 4:00:00 PM	8.50	0.00	8.50
		41.16	0.00	41.16



9/4/2015 4:03:11 PM

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SNI 0124

APP 412

**Employee Time Detail**

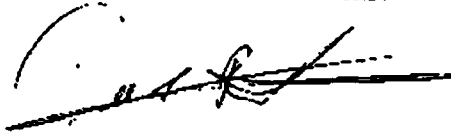
Period: 9/5/2015 - 9/11/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID:

Name: Dimas Rodriguez

Period: 9/5/2015 - 9/11/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/8/2015 7:30:00 AM	9/8/2015 4:00:00 PM	8.50	0.00	8.50
9/9/2015 7:40:00 AM	9/9/2015 3:50:00 PM	8.17	0.00	8.17
9/10/2015 7:20:00 AM	9/10/2015 4:00:00 PM	8.67	0.00	8.67
9/11/2015 7:30:00 AM	9/11/2015 4:00:00 PM	8.50	0.00	8.50
		33.84	0.00	33.84



9/11/2015 3:57:51 PM

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CONFIDENTIAL

SNI 0125

APP 413

**Employee Time Detail**

Period: 9/12/2015 - 9/18/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 9/12/2015 - 9/18/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/15/2015 7:30:00 AM	9/15/2015 3:50:00 PM	8.33	0.00	8.33
9/16/2015 7:30:00 AM	9/16/2015 4:10:00 PM	8.67	0.00	8.67
9/17/2015 7:30:00 AM	9/17/2015 4:00:00 PM	8.50	0.00	8.50
9/18/2015 7:30:00 AM	9/18/2015 3:50:00 PM	8.33	0.00	8.33
		33.83	0.00	33.83

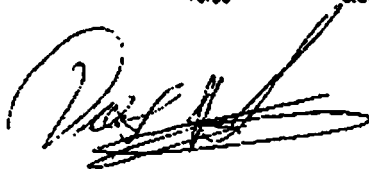


**Employee Time Detail**

Period: 9/19/2015 - 9/25/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:****Name:** Dimas Rodriguez**Period:** 9/19/2015 - 9/25/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
9/21/2015 7:30:00 AM	9/21/2015 3:50:00 PM	8.33	0.00	8.33
9/22/2015 7:30:00 AM	9/22/2015 3:50:00 PM	8.33	0.00	8.33
9/23/2015 7:30:00 AM	9/23/2015 3:20:00 PM	7.83	0.00	7.83
9/24/2015 8:10:00 AM	9/24/2015 4:10:00 PM	8.00	0.00	8.00
9/25/2015 7:30:00 AM	9/25/2015 4:00:00 PM	8.50	0.00	8.50
		40.99	0.00	40.99



10/2/2015 3:10:05 PM

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SNI 0127

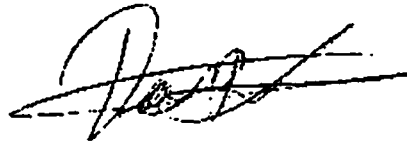
APP 415

**Employee Time Detail**

Period: 9/26/2015 - 10/2/2015  
Employee:  
Work Group:  
Job:  
Pay Type:

**Employee ID:**                      **Name:** Dimas Rodriguez                      **Period:** 9/26/2015 - 10/2/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>OVT Hours</u>	<u>Total Hours</u>
9/29/2015 7:30:00 AM	9/29/2015 4:00:00 PM	8.50	0.00	8.50
9/30/2015 7:30:00 AM	9/30/2015 3:50:00 PM	8.33	0.00	8.33
10/1/2015 7:30:00 AM	10/1/2015 4:00:00 PM	8.50	0.00	8.50
10/2/2015 7:30:00 AM	10/2/2015 4:00:00 PM	8.50	0.00	8.50
		33.83	0.00	33.83



**Employee Time Detail**

Period: 10/3/2015 - 10/9/2015  
 Employee:  
 Work Group:  
 Job:  
 Pay Type:

Employee ID: Name: Dimas Rodriguez Period: 10/3/2015 - 10/9/2015

<u>Time In</u>	<u>Time Out</u>	<u>Regular Hours</u>	<u>O/T Hours</u>	<u>Total Hours</u>
10/6/2015 7:20:00 AM	10/6/2015 3:50:00 PM	8.50	0.00	8.50
10/7/2015 7:30:00 AM	10/7/2015 3:50:00 PM	8.33	0.00	8.33
10/8/2015 7:30:00 AM	10/8/2015 4:00:00 PM	8.50	0.00	8.50
10/9/2015 7:20:00 AM	10/9/2015 9:30:00 AM	2.17	0.00	2.17
		27.50	0.00	27.50

*Last Pay Week.*

10/16/2015 4:04:21 PM

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CONFIDENTIAL

SNI 0129

APP 417



DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	320.00			
Soc_Sec	-19.84	-19.84 Regular	32.00	10.00	320.00
Medicare	-4.64	-4.64			

Net Check: \$295.52 Total 32.00 320.00

Pay Period Beginning: Dec 27, 2014

Check Date: 1/1/15

Pay Period Ending: Jan 2, 2015

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3543

Jan 1, 2015

295.52

Two Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	320.00			
Soc_Sec	-19.84	-19.84 Regular	32.00	10.00	320.00
Medicare	-4.64	-4.64			

Net Check: \$295.52 Total 32.00 320.00

Pay Period Beginning: Dec 27, 2014

Check Date: 1/1/15

Pay Period Ending: Jan 2, 2015

Weeks in Pay Period: 1

Check Number: 3543

DEPOSITION  
EXHIBIT

10

PENGAD 800-631-6866

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	320.00	640.00		32.00	10.00	320.00
Soc_Sec	-19.84	-39.68 Regular				
Medicare	-4.64	-9.28				
Advance	-50.00	-50.00				

Net Check: \$245.52 Total 32.00 320.00

Pay Period Beginning: Jan 3, 2015

Check Date: 1/9/15

Pay Period Ending: Jan 9, 2015

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3507

Jan 9, 2015

245.52

Two Hundred Forty-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	320.00	640.00		32.00	10.00	320.00
Soc_Sec	-19.84	-39.68 Regular				
Medicare	-4.64	-9.28				
Advance	-50.00	-50.00				

Net Check: \$245.52 Total 32.00 320.00

Pay Period Beginning: Jan 3, 2015

Check Date: 1/9/15

Pay Period Ending: Jan 9, 2015

Weeks in Pay Period: 1

Check Number: 3507

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	1,280.00	32.00	10.00	320.00
Soc_Sec	-19.84	-79.36 Regular			
Medicare	-4.64	-18.56			
Advance	-50.00	-150.00			

Net Check: \$245.52  
 Pay Period Beginning: Jan 17, 2015  
 Pay Period Ending: Jan 23, 2015

Total

32.00

320.00

Check Date: 1/23/15

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 3518

Jan 23, 2015

245.52

Two Hundred Forty-Five and 52/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	1,280.00	32.00	10.00	320.00
Soc_Sec	-19.84	-79.36 Regular			
Medicare	-4.64	-18.56			
Advance	-50.00	-150.00			

Net Check: \$245.52  
 Pay Period Beginning: Jan 17, 2015  
 Pay Period Ending: Jan 23, 2015

Total

32.00

320.00

Check Date: 1/23/15

Weeks in Pay Period: 1

Check Number: 3518

PL Date 0024

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	1,600.00	32.00	10.00	320.00
Soc_Sec	-19.84	-99.20 Regular			
Medicare	-4.64	-23.20			
Advance		-150.00			

Net Check: \$235.52  
 Pay Period Beginning: Jan 24, 2015  
 Pay Period Ending: Jan 30, 2015

Total

32.00

320.00

Check Date: 1/30/15

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 3554

Jan 30, 2015

295.52

Two Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	1,600.00	32.00	10.00	320.00
Soc_Sec	-19.84	-99.20 Regular			
Medicare	-4.64	-23.20			
Advance		-150.00			

Net Check: \$295.52  
 Pay Period Beginning: Jan 24, 2015  
 Pay Period Ending: Jan 30, 2015

Total

32.00

320.00

Check Date: 1/30/15

Weeks in Pay Period: 1

Check Number: 3554

PL Docs 0025

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	1,920.00	32.00	10.00	320.00
Soc_Sec	-19.84	-119.04 Regular			
Medicare	-4.64	-27.84			
Advance	-50.00	-200.00			

Net Check: \$245.52  
 Pay Period Beginning: Jan 31, 2015  
 Pay Period Ending: Feb 6, 2015

Total

32.00

320.00

Check Date: 2/6/15

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 3523

Feb 6, 2015

245.52

Two Hundred Forty-Five and 52/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	1,920.00	32.00	10.00	320.00
Soc_Sec	-19.84	-119.04 Regular			
Medicare	-4.64	-27.84			
Advance	-50.00	-200.00			

Net Check: \$245.52  
 Pay Period Beginning: Jan 31, 2015  
 Pay Period Ending: Feb 6, 2015

Total

32.00

320.00

Check Date: 2/6/15

Weeks in Pay Period: 1

Check Number: 3523

PL Docs 0026

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	240.00	2,160.00	24.00	10.00	240.00
Soc_Sec	-14.88	-133.92 Regular			
Medicare	-3.48	-31.32			
Advance		-200.00			

Net Check: \$221.64  
 Pay Period Beginning: Feb 7, 2015  
 Pay Period Ending: Feb 13, 2015

Total

24.00

240.00

Check Date: 2/13/15

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 3561

Feb 13, 2015

221.64

Two Hundred Twenty-One and 64/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	240.00	2,160.00	24.00	10.00	240.00
Soc_Sec	-14.88	-133.92 Regular			
Medicare	-3.48	-31.32			
Advance		-200.00			

Net Check: \$221.64  
 Pay Period Beginning: Feb 7, 2015  
 Pay Period Ending: Feb 13, 2015

Total

24.00

240.00

Check Date: 2/13/15

Weeks in Pay Period: 1

Check Number: 3561

PL Docs 0027

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	240.00	2,400.00	24.00	10.00	240.00
Soc_Sec	-14.88	-148.80 Regular			
Medicare	-3.48	-34.80			
Advance		-200.00			

Net Check: \$221.64  
 Pay Period Beginning: Feb 21, 2015  
 Pay Period Ending: Feb 27, 2015

Total

24.00

240.00

Check Date: 2/27/15

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 3571

Feb 27, 2015

221.64

Two Hundred Twenty-One and 64/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	240.00	2,400.00	24.00	10.00	240.00
Soc_Sec	-14.88	-148.80 Regular			
Medicare	-3.48	-34.80			
Advance		-200.00			

Net Check: \$221.64  
 Pay Period Beginning: Feb 21, 2015  
 Pay Period Ending: Feb 27, 2015

Total

24.00

240.00

Check Date: 2/27/15

Weeks in Pay Period: 1

Check Number: 3571

PL\_Docs 0028

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	160.00	2,560.00		16.00	10.00	160.00
Soc_Sec	-9.92	-158.72	Regular			
Medicare	-2.32	-37.12				
Advance		-200.00				

Net Check: \$147.76  
 Pay Period Beginning: Feb 28, 2015  
 Pay Period Ending: Mar 6, 2015

Total

16.00

160.00

Check Date: 3/6/15

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 3577

Mar 6, 2015

147.76

One Hundred Forty-Seven and 76/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	160.00	2,560.00		16.00	10.00	160.00
Soc_Sec	-9.92	-158.72	Regular			
Medicare	-2.32	-37.12				
Advance		-200.00				

Net Check: \$147.76  
 Pay Period Beginning: Feb 28, 2015  
 Pay Period Ending: Mar 6, 2015

Total

16.00

160.00

Check Date: 3/6/15

Weeks in Pay Period: 1

Check Number: 3577

PL\_Docs 0029



DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	400.00	2,960.00		40.00	10.00	400.00
Fed_Income	-0.38	-0.38	Regular			
Soc_Sec	-24.80	-183.52				
Medicare	-5.80	-42.92				
Advance	-100.00	-300.00				

Net Check: \$269.02      Total 40.00      400.00

Pay Period Beginning: Mar 7, 2015      Check Date: 3/13/15

Pay Period Ending: Mar 13, 2015      Weeks in Pay Period: 1

SILAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3581

Mar 13, 2015

269.02

Two Hundred Sixty-Nine and 02/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	400.00	2,960.00		40.00	10.00	400.00
Fed_Income	-0.38	-0.38	Regular			
Soc_Sec	-24.80	-183.52				
Medicare	-5.80	-42.92				
Advance	-100.00	-300.00				

Net Check: \$269.02      Total 40.00      400.00

Pay Period Beginning: Mar 7, 2015      Check Date: 3/13/15

Pay Period Ending: Mar 13, 2015      Weeks in Pay Period: 1

Check Number: 3581

PL Docs 0031

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	3,280.00	32.00	10.00	320.00
Fed_Income		-0.38 Regular			
Soc_Sec	-19.84	-203.36			
Medicare	-4.64	-47.56			
Advance	-50.00	-350.00			

Net Check: \$245.52  
 Pay Period Beginning: Mar 14, 2015  
 Pay Period Ending: Mar 20, 2015

Total

32.00

320.00

Check Date: 3/20/15

Weeks in Pay Period: 1

SHAN NAMKEEN, INC.  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 3586

Mar 20, 2015

245.52

Two Hundred Forty-Five and 52/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	3,280.00	32.00	10.00	320.00
Fed_Income		-0.38 Regular			
Soc_Sec	-19.84	-203.36			
Medicare	-4.64	-47.56			
Advance	-50.00	-350.00			

Net Check: \$245.52  
 Pay Period Beginning: Mar 14, 2015  
 Pay Period Ending: Mar 20, 2015

Total

32.00

320.00

Check Date: 3/20/15

Weeks in Pay Period: 1

Check Number: 3586

PL Docs 0032

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	3,600.00	32.00	10.00	320.00
Fed_Income		-0.38 Regular			
Soc_Sec	-19.84	-223.20			
Medicare	-4.64	-52.20			
Advance		-350.00			

Net Check: \$295.52 Total 32.00 320.00

Pay Period Beginning: Mar 21, 2015

Check Date: 3/27/15

Pay Period Ending: Mar 27, 2015

Weeks in Pay Period: 1

SHAN NAWKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3596

Mar 27, 2015

295.52

Two Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	3,600.00	32.00	10.00	320.00
Fed_Income		-0.38 Regular			
Soc_Sec	-19.84	-223.20			
Medicare	-4.64	-52.20			
Advance		-350.00			

Net Check: \$295.52 Total 32.00 320.00

Pay Period Beginning: Mar 21, 2015

Check Date: 3/27/15

Pay Period Ending: Mar 27, 2015

Weeks in Pay Period: 1

Check Number: 3596

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # xxx-xx-1175

	This Check	Year to Date	Regular	Hours	Rate	Total
Gross	320.00	4,880.00		32.00	10.00	320.00
Fed Income		-0.38				
Soc Sec	-19.84	-302.56				
Medicare	-4.64	-70.76				
Advance		-500.00				

Net Check: \$295.52

Total

32.00

320.00

Pay Period Beginning: Apr 18, 2015

Check Date: 4/24/15

Pay Period Ending: Apr 24, 2015

Weeks in Pay Period: 1

SHAN NAMKEEN INC  
2731 NATIONAL CIRCLE SUITE 101  
GARLAND, TX 75041

4021

Apr 24, 2015

295.52

Two Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # xxx-xx-1175

	This Check	Year to Date	Regular	Hours	Rate	Total
Gross	320.00	4,880.00		32.00	10.00	320.00
Fed Income		-0.38				
Soc Sec	-19.84	-302.56				
Medicare	-4.64	-70.76				
Advance		-500.00				

Net Check: \$295.52

Total

32.00

320.00

Pay Period Beginning: Apr 18, 2015

Check Date: 4/24/15

Pay Period Ending: Apr 24, 2015

Weeks in Pay Period: 1

Check Number 4021

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # xxx-xx-1175

	This Check	Year to Date	Regular	Hours	Rate	Total
Gross	320.00	5,200.00		32.00	10.00	320.00
Fed Income		-0.38				
Soc Sec	-19.84	-322.40				
Medicare	-4.64	-75.40				
Advance		-500.00				

Net Check: \$295.52

Total

32.00

320.00

Pay Period Beginning: Apr 25, 2015

Check Date: 5/1/15

Pay Period Ending: May 1, 2015

Weeks in Pay Period: 1

SHAN NAMKEEN INC  
2731 NATIONAL CIRCLE SUITE 101  
GARLAND, TX 75041

4028

May 1, 2015

295.52

Two Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # xxx-xx-1175

	This Check	Year to Date	Regular	Hours	Rate	Total
Gross	320.00	5,200.00		32.00	10.00	320.00
Fed Income		-0.38				
Soc Sec	-19.84	-322.40				
Medicare	-4.64	-75.40				
Advance		-500.00				

Net Check: \$295.52

Total

32.00

320.00

Pay Period Beginning: Apr 25, 2015

Check Date: 5/1/15

Pay Period Ending: May 1, 2015

Weeks in Pay Period: 1

Check Number 4028



DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # xxx-xx-1175

	This Check	Year to Date	Regular	Hours	Rate	Total
Gross	320.00	5,520.00		32.00	10.00	320.00
Fed Income		-0.38				
Soc Sec	-19.84	-342.24				
Medicare	-4.64	-80.04				
Advance		-500.00				

Net Check: \$295.52 Total 32.00 320.00

Pay Period Beginning: May 2, 2015 Check Date: 5/8/15

Pay Period Ending: May 8, 2015 Weeks in Pay Period: 1

SHAN NAMKEEN INC  
2731 NATIONAL CIRCLE SUITE 101  
GARLAND, TX 75041

4032

May 8, 2015

295.52

Two Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # xxx-xx-1175

	This Check	Year to Date	Regular	Hours	Rate	Total
Gross	320.00	5,520.00		32.00	10.00	320.00
Fed Income		-0.38				
Soc Sec	-19.84	-342.24				
Medicare	-4.64	-80.04				
Advance		-500.00				

Net Check: \$295.52 Total 32.00 320.00

Pay Period Beginning: May 2, 2015 Check Date: 5/8/15

Pay Period Ending: May 8, 2015 Weeks in Pay Period: 1

Check Number 4032

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	
Gross	475.00	9,275.00	
Fed_Income	-7.88	-34.92	Regular
Soc_Sec	-29.45	-575.05	Overtime
Medicare	-6.89	-134.50	
Advance		-650.00	

Hours	Rate	Total
40.00	10.00	400.00
5.00	15.00	75.00

Net Check: \$430.78  
 Pay Period Beginning: Jul 4, 2015  
 Pay Period Ending: Jul 10, 2015

Total

45.00

475.00

Check Date: 7/10/15

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 3643

Jul 10, 2015

430.78

Four Hundred Thirty and 78/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	
Gross	475.00	9,275.00	
Fed_Income	-7.88	-34.92	Regular
Soc_Sec	-29.45	-575.05	Overtime
Medicare	-6.89	-134.50	
Advance		-650.00	

Hours	Rate	Total
40.00	10.00	400.00
5.00	15.00	75.00

Net Check: \$430.78  
 Pay Period Beginning: Jul 4, 2015  
 Pay Period Ending: Jul 10, 2015

Total

45.00

475.00

Check Date: 7/10/15

Weeks in Pay Period: 1

Check Number: 3643

PL\_Docs 0030

APP 432

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	350.00	9,625.00			
Fed_Income		-34.92 Regular	35.00	10.00	350.00
Soc_Sec	-21.70	-596.75 Overtime		15.00	
Medicare	-5.08	-139.58			
Advance	-300.00	-950.00			

Net Check: \$23.22 Total 35.00 350.00

Pay Period Beginning: Jul 11, 2015

Check Date: 7/17/15

Pay Period Ending: Jul 17, 2015

Weeks in Pay Period: 1

SHAN NAMKEEN, INC.  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3655

Jul 17, 2015

23.22

Twenty-Three and 22/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	350.00	9,625.00			
Fed_Income		-34.92 Regular	35.00	10.00	350.00
Soc_Sec	-21.70	-596.75 Overtime		15.00	
Medicare	-5.08	-139.58			
Advance	-300.00	-950.00			

Net Check: \$23.22 Total 35.00 350.00

Pay Period Beginning: Jul 11, 2015

Check Date: 7/17/15

Pay Period Ending: Jul 17, 2015

Weeks in Pay Period: 1

Check Number: 3655

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PL Docs 0037



DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	9,945.00			
Fed_Income		-34.92 Regular	32.00	10.00	320.00
Soc_Sec	-19.84	-616.59 Overtime		15.00	
Medicare	-4.64	-144.22			
Advance	-250.00	-1,200.00			

Net Check: \$45.52                      Total                      32.00                      320.00

Pay Period Beginning: Jul 18, 2015

Check Date: 7/24/15

Pay Period Ending: Jul 24, 2015

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3662

Jul 24, 2015

45.52

Forty-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMEFIS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	9,945.00			
Fed_Income		-34.92 Regular	32.00	10.00	320.00
Soc_Sec	-19.84	-616.59 Overtime		15.00	
Medicare	-4.64	-144.22			
Advance	-250.00	-1,200.00			

Check: \$45.52

Total

32.00

320.00

Pay Period Beginning: Jul 18, 2015

Check Date: 7/24/15

Pay Period Ending: Jul 24, 2015

Weeks in Pay Period: 1

Check Number: 3662

PL Docs 0038

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DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	310.00	10,255.00			
Fed_Income		-34.92 Regular	31.00	10.00	310.00
Soc_Sec	-19.22	-635.81 Overtime		15.00	
Medicare	-4.50	-148.72			
Advance	-250.00	-1,450.00			

Net Check: \$36.28

Total

31.00

310.00

Pay Period Beginning: Jul 25, 2015

Check Date: 7/31/15

Pay Period Ending: Jul 31, 2015

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3674

Jul 31, 2015

36.28

Thirty-Six and 28/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	310.00	10,255.00			
Fed_Income		-34.92 Regular	31.00	10.00	310.00
Soc_Sec	-19.22	-635.81 Overtime		15.00	
Medicare	-4.50	-148.72			
Advance	-250.00	-1,450.00			

Check: \$36.28

Total

31.00

310.00

Pay Period Beginning: Jul 25, 2015

Check Date: 7/31/15

Pay Period Ending: Jul 31, 2015

Weeks in Pay Period: 1

Check Number: 3674

PL Docs 0030

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	330.00	10,885.00			
Fed_Income		-34.92 Regular	33.00	10.00	330.00
Soc_Sec	-20.46	-674.87 Overtime		15.00	
Medicare	-4.79	-157.86			
Advance	-200.00	-1,650.00			

Net Check: \$104.75 Total 33.00 330.00

Pay Period Beginning: Aug 8, 2015

Check Date: 8/14/15

Pay Period Ending: Aug 14, 2015

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3690

Aug 14, 2015

104.75

One Hundred Four and 75/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	330.00	10,885.00			
Fed_Income		-34.92 Regular	33.00	10.00	330.00
Soc_Sec	-20.46	-674.87 Overtime		15.00	
Medicare	-4.79	-157.86			
Advance	-200.00	-1,650.00			

Check: \$104.75 Total 33.00 330.00

Pay Period Beginning: Aug 8, 2015

Check Date: 8/14/15

Pay Period Ending: Aug 14, 2015

Weeks in Pay Period: 1

Check Number: 3690

PL Docs 0040

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	11,205.00	32.00	10.00	320.00
Fed_Income		-34.92 Regular		15.00	
Soc_Sec	-19.84	-694.71 Overtime			
Medicare	-4.64	-162.50			
Advance		-1,650.00			

Net Check: \$295.52 Total 32.00 320.00

Pay Period Beginning: Aug 15, 2015 Check Date: 8/21/15

Pay Period Ending: Aug 21, 2015 Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3699

Aug 21, 2015

295.52

Two Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	11,205.00	32.00	10.00	320.00
Fed_Income		-34.92 Regular		15.00	
Soc_Sec	-19.84	-694.71 Overtime			
Medicare	-4.64	-162.50			
Advance		-1,650.00			

Net Check: \$295.52 Total 32.00 320.00

Pay Period Beginning: Aug 15, 2015 Check Date: 8/21/15

Pay Period Ending: Aug 21, 2015 Weeks in Pay Period: 1

Check Number: 3699

PL\_Docs 0041

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DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	400.00	11,925.00		40.00	10.00	400.00
Fed_Income	-0.38	-35.30	Regular		15.00	
Soc_Sec	-24.80	-739.35	Overtime			
Medicare	-5.80	-172.94				
Advance	-200.00	-1,850.00				

Net Check: \$169.02 Total 40.00 400.00

Pay Period Beginning: Aug 29, 2015 Check Date: 9/4/15

Pay Period Ending: Sep 4, 2015 Weeks in Pay Period: 1

SHAN HANKEEN, INC  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3721

Sep 4, 2015

169.02

One Hundred Sixty-Nine and 02/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	400.00	11,925.00		40.00	10.00	400.00
Fed_Income	-0.38	-35.30	Regular		15.00	
Soc_Sec	-24.80	-739.35	Overtime			
Medicare	-5.80	-172.94				
Advance	-200.00	-1,850.00				

Check: \$169.02 Total 40.00 400.00

Pay Period Beginning: Aug 29, 2015 Check Date: 9/4/15

Pay Period Ending: Sep 4, 2015 Weeks in Pay Period: 1

Check Number: 3721

PL\_Docs 0042

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	12,245.00	32.00	10.00	320.00
Fed_Income		-35.30 Regular		15.00	
Soc_Sec	-19.84	-759.19 Overtime			
Medicare	-4.64	-177.58			
Advance		-1,850.00			

Net Check: \$295.52

Total

32.00

320.00

Pay Period Beginning: Sep 5, 2015

Check Date: 9/11/15

Pay Period Ending: Sep 11, 2015

Weeks in Pay Period: 1

SHAN NAMKEEN, INC.  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: 3732

Sep 11, 2015

295.52

Two Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
12878 S-JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date	Hours	Rate	Total
Gross	320.00	12,245.00	32.00	10.00	320.00
Fed_Income		-35.30 Regular		15.00	
Soc_Sec	-19.84	-759.19 Overtime			
Medicare	-4.64	-177.58			
Advance		-1,850.00			

Check: \$295.52

Total

32.00

320.00

Pay Period Beginning: Sep 5, 2015

Check Date: 9/11/15

Pay Period Ending: Sep 11, 2015

Weeks in Pay Period: 1

Check Number: 3732

PL\_Docs 0043

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	320.00	12,565.00		32.00	10.00	320.00
Fed_Income		-35.30	Regular		15.00	
Soc_Sec	-19.84	-779.03	Overtime			
Medicare	-4.64	-182.22				
Advance		-1,850.00				

Net Check: \$295.52  
 Pay Period Beginning: Sep 12, 2015  
 Pay Period Ending: Sep 18, 2015

Total

32.00

320.00

Check Date: 9/18/15

Weeks in Pay Period: 1

SHAN NAMKEEN, INC  
 2731 NATIONAL CIR  
 GARLAND, TX 75041

Check Number: 3738

Sep 18, 2015

295.52

Two Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
 12879 S JOSEY LN 170  
 FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	320.00	12,565.00		32.00	10.00	320.00
Fed_Income		-35.30	Regular		15.00	
Soc_Sec	-19.84	-779.03	Overtime			
Medicare	-4.64	-182.22				
Advance		-1,850.00				

Check: \$295.52  
 Pay Period Beginning: Sep 12, 2015  
 Pay Period Ending: Sep 18, 2015

Total

32.00

320.00

Check Date: 9/18/15

Weeks in Pay Period: 1

Check Number: 3738

PK Docs 0044



DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	320.00	13,275.00		32.00	10.00	320.00
Fed_Income		-35.30	Regular		15.00	
Soc_Sec	-19.84	-823.05	Overtime			
Medicare	-4.64	-192.52				
Advance		-1,950.00				

Net Check: \$295.52

Total

32.00

320.00

Pay Period Beginning: Sep 26, 2015

Check Date: 10/2/15

Pay Period Ending: Oct 2, 2015

Weeks in Pay Period: 1

SHAN NAMKEEN, INC.  
2731 NATIONAL CIR  
GARLAND, TX 75041

Check Number: ~~3750~~  
3756

Oct 2, 2015

295.52

Two Hundred Ninety-Five and 52/100 Dollars

DIMAS RODRIGUES  
12879 S JOSEY LN 170  
FARMERS BRANCH, TX 75234

DIMAS RODRIGUES

Employee ID: ROD03

Social Sec # [REDACTED]

	This Check	Year to Date		Hours	Rate	Total
Gross	320.00	13,275.00		32.00	10.00	320.00
Fed_Income		-35.30	Regular		15.00	
Soc_Sec	-19.84	-823.05	Overtime			
Medicare	-4.64	-192.52				
Advance		-1,950.00				

Check: \$295.52

Total

32.00

320.00

Pay Period Beginning: Sep 26, 2015

Check Date: 10/2/15

Pay Period Ending: Oct 2, 2015

Weeks in Pay Period: 1

Check Number: 3750

PL\_Docs 0045



a Employee's SSN [REDACTED]		1 Wages, tips, other compensation 13,535.00		2 Federal income tax withheld 35.30	
OMB No. 1545-0008		3 Social security wages 13,535.00		4 Social security tax withheld 839.17	
b Employer identification number [REDACTED]		5 Medicare wages and tips 13,535.00		6 Medicare tax withheld 196.29	
c Employer's name, address, and ZIP code SHAN NAMKEEN, INC 2731 NATIONAL CIRCLE SUITE 101 GARLAND TX 75041					
e Employee's first name and initial DIMAS		Last name RODRIGUES		Suff.	
14221 HERITAGE CIRCLE #3-2019 FARMERS BRANCH TX 75234					
f Employee's address and ZIP code					
d Control number		7 Social security tips		8 Allocated tips	
9		10 Dependent care benefits		11 Nonqualified plans	
12a		14 Other			
12b					
12c					
12d					
13 Statutory employee <input type="checkbox"/>		Retirement plan <input type="checkbox"/>		Third-party sick pay <input type="checkbox"/>	
15 State Employer's state ID number		16 State wages, tips, etc.		17 State income tax	
18 Local wages, tips, etc.		19 Local income tax		20 Locality name	

Form W-2 Wage and Tax Statement 2015

Department of the Treasury-Internal Revenue Service  
Copy B - To Be Filed With Employee's FEDERAL Tax Return.

a Employee's SSN [REDACTED]		1 Wages, tips, other compensation 13,535.00		2 Federal income tax withheld 35.30	
OMB No. 1545-0008		3 Social security wages 13,535.00		4 Social security tax withheld 839.17	
b Employer identification number [REDACTED]		5 Medicare wages and tips 13,535.00		6 Medicare tax withheld 196.29	
c Employer's name, address, and ZIP code SHAN NAMKEEN, INC 2731 NATIONAL CIRCLE SUITE 101 GARLAND TX 75041					
e Employee's first name and initial DIMAS		Last name RODRIGUES		Suff.	
14221 HERITAGE CIRCLE #3-2019 FARMERS BRANCH TX 75234					
f Employee's address and ZIP code					
d Control number		7 Social security tips		8 Allocated tips	
9		10 Dependent care benefits		11 Nonqualified plans	
12a		14 Other			
12b					
12c					
12d					
13 Statutory employee <input type="checkbox"/>		Retirement plan <input type="checkbox"/>		Third-party sick pay <input type="checkbox"/>	
15 State Employer's state ID number		16 State wages, tips, etc.		17 State income tax	
18 Local wages, tips, etc.		19 Local income tax		20 Locality name	

Form W-2 Wage and Tax Statement 2015

Department of the Treasury-Internal Revenue Service  
Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return.

a Employee's SSN [REDACTED]		1 Wages, tips, other compensation 13,535.00		2 Federal income tax withheld 35.30	
OMB No. 1545-0008		3 Social security wages 13,535.00		4 Social security tax withheld 839.17	
b Employer identification number [REDACTED]		5 Medicare wages and tips 13,535.00		6 Medicare tax withheld 196.29	
c Employer's name, address, and ZIP code SHAN NAMKEEN, INC 2731 NATIONAL CIRCLE SUITE 101 GARLAND TX 75041					
e Employee's first name and initial DIMAS		Last name RODRIGUES		Suff.	
14221 HERITAGE CIRCLE #3-2019 FARMERS BRANCH TX 75234					
f Employee's address and ZIP code					
d Control number		7 Social security tips		8 Allocated tips	
9		10 Dependent care benefits		11 Nonqualified plans	
12a		14 Other			
12b					
12c					
12d					
13 Statutory employee <input type="checkbox"/>		Retirement plan <input type="checkbox"/>		Third-party sick pay <input type="checkbox"/>	
15 State Employer's state ID number		16 State wages, tips, etc.		17 State income tax	
18 Local wages, tips, etc.		19 Local income tax		20 Locality name	

Form W-2 Wage and Tax Statement 2015

Copy C - For EMPLOYEE'S RECORDS.

This information is being furnished to the Internal Revenue Service. If you are required to file a tax return, a negligence penalty or other sanction may be imposed on you if this income is taxable and you fail to report it.

a Employee's SSN [REDACTED]		1 Wages, tips, other compensation 13,535.00		2 Federal income tax withheld 35.30	
OMB No. 1545-0008		3 Social security wages 13,535.00		4 Social security tax withheld 839.17	
b Employer identification number [REDACTED]		5 Medicare wages and tips 13,535.00		6 Medicare tax withheld 196.29	
c Employer's name, address, and ZIP code SHAN NAMKEEN, INC 2731 NATIONAL CIRCLE SUITE 101 GARLAND TX 75041					
e Employee's first name and initial DIMAS		Last name RODRIGUES		Suff.	
14221 HERITAGE CIRCLE #3-2019 FARMERS BRANCH TX 75234					
f Employee's address and ZIP code					
d Control number		7 Social security tips		8 Allocated tips	
9		10 Dependent care benefits		11 Nonqualified plans	
12a		14 Other			
12b					
12c					
12d					
13 Statutory employee <input type="checkbox"/>		Retirement plan <input type="checkbox"/>		Third-party sick pay <input type="checkbox"/>	
15 State Employer's state ID number		16 State wages, tips, etc.		17 State income tax	
18 Local wages, tips, etc.		19 Local income tax		20 Locality name	

Form W-2 Wage and Tax Statement 2015

Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return.

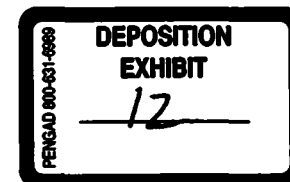


PL\_Docs 0053

**SHAN NAMKEEN, INC****Payroll Register****For the Period From Jan 1, 2015 to Dec 31, 2015**

Filter Criteria includes: 1) Employee IDs ROD03. Report order is by Check Date. Report is printed in Detail Form

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hrs	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_ER	Medicare FUTA_ER
ROD03 DIMAS RODRIGUES XXX-XX-1175 3543 1/1/15	Regular	32.00	10.00	320.00	295.52	320.00		-19.84	-4.64
						-1.73	-19.84	-4.64	-1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 3507 1/9/15	Regular	32.00	10.00	320.00	245.52	320.00		-19.84	-4.64
						-50.00 -1.73	-19.84	-4.64	-1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 3511 1/16/15	Regular	32.00	10.00	320.00	245.52	320.00		-19.84	-4.64
						-50.00 -1.73	-19.84	-4.64	-1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 3518 1/23/15	Regular	32.00	10.00	320.00	245.52	320.00		-19.84	-4.64
						-50.00 -1.73	-19.84	-4.64	-1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 3554 1/30/15	Regular	32.00	10.00	320.00	295.52	320.00		-19.84	-4.64
						-1.73	-19.84	-4.64	-1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 3523 2/6/15	Regular	32.00	10.00	320.00	245.52	320.00		-19.84	-4.64
						-50.00 -1.73	-19.84	-4.64	-1.92



**SHAN NAMKEEN, INC****Payroll Register****For the Period From Jan 1, 2015 to Dec 31, 2015**

Filter Criteria includes: 1) Employee IDs. ROD03. Report order is by Check Date. Report is printed in Detail Form

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hrs	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_ER	Medicare FUTA_ER
ROD03 DIMAS RODRIGUES XXX-XX-1175 3561 2/13/15	Regular	24.00	10.00	240.00	221.64	240.00  -1.30	 -14.88	-14.88 -3.48	-3.48 -1.44
ROD03 DIMAS RODRIGUES XXX-XX-1175 3571 2/27/15	Regular	24.00	10.00	240.00	221.64	240.00  -1.30	 -14.88	-14.88 -3.48	-3.48 -1.44
ROD03 DIMAS RODRIGUES XXX-XX-1175 3577 3/6/15	Regular	16.00	10.00	160.00	147.76	160.00  -0.86	 -9.92	-9.92 -2.32	-2.32 -0.96
ROD03 DIMAS RODRIGUES XXX-XX-1175 3581 3/13/15	Regular	40.00	10.00	400.00	269.02	400.00 -100.00 -2.16	-0.38 -24.80	-24.80 -5.80	-5.80 -2.40
ROD03 DIMAS RODRIGUES XXX-XX-1175 3586 3/20/15	Regular	32.00	10.00	320.00	245.52	320.00 -50.00 -1.73	 -19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 3596 3/27/15	Regular	32.00	10.00	320.00	295.52	320.00  -1.73	 -19.84	-19.84 -4.64	-4.64 -1.92

**SHAN NAMKEEN, INC****Payroll Register****For the Period From Jan 1, 2015 to Dec 31, 2015**

Filter Criteria includes: 1) Employee IDs. ROD03. Report order is by Check Date. Report is printed in Detail Form

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hrs	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_ER	Medicare FUTA_ER
ROD03 DIMAS RODRIGUES XXX-XX-1175 4003 4/3/15	Regular	32.00	10.00	320.00	245.52	320.00 -50.00 -1.73	-19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 4010 4/10/15	Regular	32.00	10.00	320.00	245.52	320.00 -50.00 -1.73	-19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 4015 4/17/15	Regular	32.00	10.00	320.00	245.52	320.00 -50.00 -1.73	-19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 4021 4/24/15	Regular	32.00	10.00	320.00	295.52	320.00 -1.73	-19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 4028 5/1/15	Regular	32.00	10.00	320.00	295.52	320.00 -1.73	-19.84	-19.84 -4.64	-4.64 -1.92
ROD03 DIMAS RODRIGUES XXX-XX-1175 4032 5/8/15	Regular	32.00	10.00	320.00	295.52	320.00 -1.73	-19.84	-19.84 -4.64	-4.64 -1.92

**SHAN NAMKEEN, INC****Payroll Register****For the Period From Jan 1, 2015 to Dec 31, 2015**

Filter Criteria includes: 1) Employee IDs: ROD03. Report order is by Check Date. Report is printed in Detail Form

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hrs	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_ER	Medicare FUTA_ER
ROD03 DIMAS RODRIGUES XXX-XX-1175 4040 5/15/15	Regular	40.00	10.00	400.00	369.02	400.00 -2.16	-0.38 -24.80	-24.80 -5.80	-5.80 -2.40
ROD03 DIMAS RODRIGUES XXX-XX-1175 4048 5/22/15	Regular	24.00	10.00	240.00	221.64	240.00 -1.30	-14.88	-14.88 -3.48	-3.48 -1.44
ROD03 DIMAS RODRIGUES XXX-XX-1175 3623 5/29/15	Regular	40.00	10.00	400.00	369.02	400.00 -2.16	-0.38 -24.80	-24.80 -5.80	-5.80 -2.40
ROD03 DIMAS RODRIGUES XXX-XX-1175 4055 6/5/15	Regular	40.00	10.00	400.00	294.02	400.00 -75.00 -2.16	-0.38 -24.80	-24.80 -5.80	-5.80 -2.40
ROD03 DIMAS RODRIGUES XXX-XX-1175 4070 6/19/15	Regular	40.00	10.00	400.00	369.02	400.00 -2.16	-0.38 -24.80	-24.80 -5.80	-5.80
ROD03 DIMAS RODRIGUES XXX-XX-1175 4063 6/24/15	Regular Overtime	40.00 5.00	10.00 15.00	400.00 75.00	355.78	475.00 -75.00 -2.57	-7.88 -29.45	-29.45 -6.89	-6.89 -0.24

**SHAN NAMKEEN, INC****Payroll Register****For the Period From Jan 1, 2015 to Dec 31, 2015**

Filter Criteria includes: 1) Employee IDs ROD03. Report order is by Check Date. Report is printed in Detail Form

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hrs	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_ER	Medicare FUTA_ER
ROD03 DIMAS RODRIGUES XXX-XX-1175 3629 6/26/15	Regular Overtime	40.00 6.00	10.00 15.00	400.00 90.00	443.13	490.00 -2.65	-9.38 -30.38	-30.38 -7.11	-7.11
ROD03 DIMAS RODRIGUES XXX-XX-1175 3636 7/3/15	Regular Overtime	40.00 5.00	10.00 15.00	400.00 75.00	430.78	475.00 -2.57	-7.88 -29.45	-29.45 -6.89	-6.89
ROD03 DIMAS RODRIGUES XXX-XX-1175 3643 7/10/15	Regular Overtime	40.00 5.00	10.00 15.00	400.00 75.00	430.78	475.00 -1.08	-7.88 -29.45	-29.45 -6.89	-6.89
ROD03 DIMAS RODRIGUES XXX-XX-1175 3655 7/17/15	Regular	35.00	10.00	350.00	23.22	350.00 -300.00	-21.70	-21.70 -5.08	-5.08
ROD03 DIMAS RODRIGUES XXX-XX-1175 3662 7/24/15	Regular	32.00	10.00	320.00	45.52	320.00 -250.00	-19.84	-19.84 -4.64	-4.64
ROD03 DIMAS RODRIGUES XXX-XX-1175 3674 7/31/15	Regular	31.00	10.00	310.00	36.28	310.00 -250.00	-19.22	-19.22 -4.50	-4.50

**SHAN NAMKEEN, INC****Payroll Register****For the Period From Jan 1, 2015 to Dec 31, 2015**

Filter Criteria includes. 1) Employee IDs ROD03. Report order is by Check Date. Report is printed in Detail Form

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hrs	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_ER	Medicare FUTA_ER
ROD03 DIMAS RODRIGUES XXX-XX-1175 3684 8/7/15	Regular	30.00	10.00	300.00	277.05	300.00	-18.60	-18.60 -4.35	-4.35
ROD03 DIMAS RODRIGUES XXX-XX-1175 3690 8/14/15	Regular	33.00	10.00	330.00	104.75	330.00 -200.00	-20.46	-20.46 -4.79	-4.79
ROD03 DIMAS RODRIGUES XXX-XX-1175 3699 8/21/15	Regular	32.00	10.00	320.00	295.52	320.00	-19.84	-19.84 -4.64	-4.64
ROD03 DIMAS RODRIGUES XXX-XX-1175 3714 8/28/15	Regular	32.00	10.00	320.00	295.52	320.00	-19.84	-19.84 -4.64	-4.64
ROD03 DIMAS RODRIGUES XXX-XX-1175 3721 9/4/15	Regular	40.00	10.00	400.00	169.02	400.00 -200.00	-0.38 -24.80	-24.80 -5.80	-5.80
ROD03 DIMAS RODRIGUES XXX-XX-1175 3732 9/11/15	Regular	32.00	10.00	320.00	295.52	320.00	-19.84	-19.84 -4.64	-4.64

**SHAN NAMKEEN, INC****Payroll Register****For the Period From Jan 1, 2015 to Dec 31, 2015**

Filter Criteria includes. 1) Employee IDs ROD03. Report order is by Check Date. Report is printed in Detail Form

Employee ID Employee Masked SS No Reference Date	Pay Type	Pay Hrs	Rate	Pay Amt	Amount	Gross Advance SUI_ER	Fed_Income Soc_Sec_ER	Soc_Sec Medicare_ER	Medicare FUTA_ER
ROD03 DIMAS RODRIGUES XXX-XX-1175 3738 9/18/15	Regular	32.00	10.00	320.00	295.52	320.00	-19.84	-19.84 -4.64	-4.64
ROD03 DIMAS RODRIGUES XXX-XX-1175 3743 9/25/15	Regular	39.00	10.00	390.00	260.16	390.00 -100.00	-24.18	-24.18 -5.66	-5.66
ROD03 DIMAS RODRIGUES XXX-XX-1175 3750 10/2/15	Regular	32.00	10.00	320.00	295.52	320.00	-19.84	-19.84 -4.64	-4.64
ROD03 DIMAS RODRIGUES XXX-XX-1175 3761 10/9/15	Regular	26.00	10.00	260.00		260.00 -240.11	-16.12	-16.12 -3.77	-3.77





Case 3:15-cv-03370-BK Document 1 Filed 10/19/15 Page 2 of 6 PageID 2

District of Texas.

**COUNT I. FEDERAL OVERTIME WAGE VIOLATION**

6. This action arises under the laws of the United States. This case is brought as a collective action under 29 U.S.C. § 216(B). It is believed that the Defendants have employed other similarly situated employees like the Plaintiff who have not been paid overtime and minimum wages for work performed in excess of 40 hours weekly from the filing of this complaint back three years.
7. This Court has jurisdiction pursuant to 28 U.S.C. § 1331 as this case is brought pursuant to The Fair Labor Standards Act, 29 U.S.C. §§ 201-219 (section #216 for jurisdictional placement).
8. 29 U.S.C. § 207(a)(1) states, "if an employer employs an employee for more than forty hours in any work week, the employer must compensate the employee for hours in excess of forty at the rate of at least one and one half times the employee's regular rate...."
9. Plaintiff, DIMAS RODRIGUEZ, worked for Defendants as a delivery driver and laborer from on or about June 15, 2013 through on or about October 9, 2015.
10. Defendants' business activities involve those to which the Fair Labor Standards Act applies. Both the Defendants' business and Plaintiff's work for the Defendants affected interstate commerce for the relevant time period. Plaintiff's work for the Defendants affected interstate commerce for the relevant time period because the materials and goods that Plaintiff handled and/or used on a constant and/or continual basis and/or that were supplied to Plaintiff by the Defendants to use on the job moved through interstate commerce prior to and/or subsequent to Plaintiff's use of the same. Plaintiff's work for the Defendants was actually in and/or so closely related to the movement of commerce while he worked for the Defendants that the

Case 3:15-cv-03370-BK Document 1 Filed 10/19/15 Page 3 of 6 PageID 3

Fair Labor Standards Act applies to Plaintiff's work for the Defendants. Defendants' business involves commercial food manufacturing.

11. Upon information and belief, the Defendant Companies had gross sales or business done in excess of \$500,000 annually for the years 2011, 2012, 2013, and 2014.
12. Upon information and belief, the Defendant Companies' sales or business done is expected to exceed \$500,000 for the year 2015.
13. Furthermore, Defendants regularly employed two or more employees for the relevant time period who handled goods or materials that travelled through interstate commerce, or used instrumentalities of interstate commerce, thus making Defendants' businesses an enterprise covered under the Fair Labor Standards Act.
14. From on or about June 15, 2013 through on or about October 15, 2013, Plaintiff, DIMAS RODRIGUEZ, worked an average of 3 completely unpaid hours per week delivering goods for the Defendants. In addition to the minimum wage violation set forth below, Plaintiff claims the half-time overtime rate for any such overtime hours worked above 40 hours as required by the Fair Labor Standards Act based on the Federal Minimum Wage of \$7.25 per hour.
15. From on or about October 16, 2013 through on or about October 9, 2015, Plaintiff, DIMAS RODRIGUEZ, was paid an average straight-time rate of \$9.00 per hour, but worked an average of 3 completely unpaid hours per week delivering goods for the Defendants. In addition to the minimum wage violation set forth below, Plaintiff claims the half-time overtime rate for any such overtime hours worked above 40 hours as required by the Fair Labor Standards Act based on either the Federal Minimum Wage of \$7.25 per hour or his regular average wage for this period of \$9.00 per hour.

16. From on or about June 15, 2013 through on or about October 15, 2013, Plaintiff, DIMAS RODRIGUEZ, was paid an average straight-time rate of \$5.00 per hour and was required to work off the clock an average of eight (8) hours per day on an average of three Saturdays or Sundays per month for which he was always paid in cash at his straight-time rate of \$5.00 per hour only. In addition to the minimum wage violation set forth below, Plaintiff therefore claims the half-time overtime rate for any such overtime hours worked above 40 hours as required by the Fair Labor Standards Act based on the Federal Minimum Wage of \$7.25 per hour for each overtime hour worked.
17. From on or about October 16, 2013 through on or about October 9, 2015, Plaintiff, DIMAS RODRIGUEZ, was paid an average straight-time rate of \$9.00 per hour, but was required to work off the clock an average of eight (8) hours per day on an average of three Saturdays or Sundays per month for which he was always paid in cash at his straight-time rate only. Plaintiff therefore claims the half-time overtime rate for any such overtime hours worked above 40 hours as required by the Fair Labor Standards Act based on his regular average straight-time wage of \$9.00 per hour for each overtime hour worked.
18. Defendants willfully and intentionally refused to pay Plaintiff's overtime wages as required by the Fair Labor Standards Act as Defendants knew of the overtime wage requirements of the Fair Labor Standards Act and recklessly failed to investigate whether Defendants' payroll practices were in accordance with the Fair Labor Standards Act. Defendants remain owing Plaintiff these wages since the commencement of Plaintiff's employment with Defendants for the time period specified above.

Wherefore, Plaintiff requests double damages and reasonable attorney fees from Defendants, pursuant to the Fair Labor Standards Act as cited above, to be proven at the time of trial for all

overtime wages still owing from Plaintiff's entire employment period with Defendants or as much as allowed by the Fair Labor Standards Act along with court costs, interest, and any other relief that this Court finds reasonable under the circumstances. *The Plaintiff requests a trial by jury.*

## **COUNT II. FEDERAL MINIMUM WAGE VIOLATION**

COMES NOW PLAINTIFF, through Counsel, and re-adopts the factual and jurisdictional statements in paragraphs 1-18 above and further states:

19. 29 U.S.C. § 206(a)(1) states "...an employer must pay a minimum wage of \$5.15/hr to an employee who is engaged in commerce..." [29 U.S.C. § 206(a)(1)]. On July 24, 2007 Federal minimum wage was raised to \$5.85/hr. On July 24, 2008, Federal minimum wage was raised to \$6.55/hr. On July 24, 2009, Federal minimum wage was raised to \$7.25/hr.

20. From on or about June 15, 2013 through on or about October 15, 2013, Plaintiff worked on the clock for an average of 32 hours per week for which he was paid an average of \$5.00 per hour. Said payment of wages is in violation of the Fair Labor Standards Act as said payment did not meet the applicable Federal Minimum Wage required for said period of time. Therefore, Plaintiff claims the difference between the amount paid to Plaintiff and the applicable Federal Minimum Wage for each hour worked in a workweek.

21. From on or about June 15, 2013 through on or about October 9, 2015, Plaintiff, DIMAS RODRIGUEZ, worked an average of 3 completely unpaid hours per week delivering goods for the Defendants. Said failure to pay wages is in violation of the Fair Labor Standards Act as said payment did not meet the applicable Federal Minimum Wage required for said period of time. Therefore, Plaintiff claims the difference between the amount paid to Plaintiff and the applicable Federal Minimum Wage for each completely unpaid hour worked.

22. Defendants willfully and intentionally refused to pay Plaintiff's minimum wages as required by the Fair Labor Standards Act as Defendants knew of the Federal Minimum Wage requirements of the Fair Labor Standards Act and recklessly failed to investigate whether Defendants' payroll practices were in accordance with the Fair Labor Standards Act. Defendants remains owing Plaintiff these wages since the commencement of Plaintiff's employment with Defendants for the time period specified above.

Wherefore, Plaintiff requests double damages and reasonable attorney fees from the Defendants pursuant to the Fair Labor Standards Act and as cited above, to be proven at the time of trial for all minimum wages still owing from Plaintiff's entire employment period with Defendants or as much as allowed by the Fair Labor Standards Act --whichever is greater along with court costs, interest, and any other relief that this Court finds reasonable under the circumstances. *The Plaintiff requests a trial by jury.*

Respectfully submitted,

By: /s/ Robert Manteuffel  
J.H. Zidell, Esq.  
Texas Bar No.: 24071840  
Email: zabogado@aol.com  
Robert L. Manteuffel  
State Bar No. 12957529  
Email: rlmanteuffel@sbcglobal.net  
Joshua A. Petersen  
Texas Bar No. 24085524  
Email: josh.a.petersen@gmail.com

**J.H. ZIDELL, P.C.**  
6310 LBJ Freeway, Ste. 112  
Dallas, Texas 75240  
Tel: (972) 233-2264  
Fax: (972) 386-7610

Robert Manteuffel  
6301 LBJ Freeway, Ste. 112  
Dallas, TX 75240

Date: Feb. 05, 2016

Dear Mr. Manteuffel,

I would just like to inform you that I would like to dismiss the labor case that file against Shan Namkeen, Inc. and no long want to pursue any more.

I thought about the case and realized that I was paid in full and there is not any payment, salary or overtime payment that they owe to me and also I acknowledged receive of payment for my proper time during my employment.

I took step of filing the case because I was in stress, uncomfortable and angry due to my personal issues and may told you something which are not correct. There was no issue what so ever with Shan Namkeen, Inc. They do not owe me any overtime payment and I never work of the clock ever during my employment.

I am feeling bad now that I should not have field this false case.

Please, I requesting you to dismiss this case immediately and send me the confirmation.

I am also sending copy of this letter to Shan Namkeen, Inc.

Sincerely,



Dimas Rodriguez.



0193



10005 200 9002  
1910 S. JERRY LN #150  
GARLAND TX 75040

**CERTIFIED MAIL**



7015 1730 0002 1458 1199



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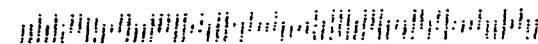


75041

U.S. POSTAGE  
PAID  
DALLAS, TX  
75234  
FEB 11, 16  
AMOUNT  
**\$6.74**  
R2304H107728-12

Shaw Karmichael, Inc  
2701 National Circle  
Suite #101  
Garland TX 75041

7504132318 0023





a Employee's SSN	1 Wages, tips, other compensation	2 Federal income tax withheld
OMB No. 1545-0008	15,080.00	
b Employer identification number	3 Social security wages	4 Social security tax withheld
	15,080.00	934.96
c Employer's name, address, and ZIP code	5 Medicare wages and tips	6 Medicare tax withheld
S2 BROTHERS, INC 2731 NATIONAL CIR GARLAND TX 75041	15,080.00	218.92
e Employee's first name and initial	Last name	Suff.
ANA MARIA	D. LA CRUZ	
14221 HERITAGE CIR # 3-209		
FARMERS BRANCH	TX 75234	
d Control number	7 Social security tips	8 Allocated tips
9	10 Dependent care benefits	11 Nonqualified plans
12a	14 Other	
12b		
12c		
12d		
13 Statutory employee <input type="checkbox"/>	Retirement plan <input type="checkbox"/>	Third-party sick pay <input type="checkbox"/>
15 State Employer's state ID number	16 State wages, tips, etc.	17 State income tax
18 Local wages, tips, etc.	19 Local income tax	20 Locality name

Form **W-2** Wage and Tax Statement **2015** Department of the Treasury-Internal Revenue Service  
Copy B - To Be Filed With Employee's FEDERAL Tax Return.

a Employee's SSN	1 Wages, tips, other compensation	2 Federal income tax withheld
OMB No. 1545-0008	15,080.00	
b Employer identification number	3 Social security wages	4 Social security tax withheld
	15,080.00	934.96
c Employer's name, address, and ZIP code	5 Medicare wages and tips	6 Medicare tax withheld
S2 BROTHERS, INC 2731 NATIONAL CIR GARLAND TX 75041	15,080.00	218.92
e Employee's first name and initial	Last name	Suff.
ANA MARIA	D. LA CRUZ	
14221 HERITAGE CIR # 3-209		
FARMERS BRANCH	TX 75234	
d Control number	7 Social security tips	8 Allocated tips
9	10 Dependent care benefits	11 Nonqualified plans
12a	14 Other	
12b		
12c		
12d		
13 Statutory employee <input type="checkbox"/>	Retirement plan <input type="checkbox"/>	Third-party sick pay <input type="checkbox"/>
15 State Employer's state ID number	16 State wages, tips, etc.	17 State income tax
18 Local wages, tips, etc.	19 Local income tax	20 Locality name

Form **W-2** Wage and Tax Statement **2015** Copy C - For EMPLOYEE'S RECORDS.

This information is being furnished to the Internal Revenue Service. If you are required to file a tax return, a negligence penalty or other sanction may be imposed on you if this income is taxable and you fail to report it.

a Employee's SSN	1 Wages, tips, other compensation	2 Federal income tax withheld
OMB No. 1545-0008	15,080.00	
b Employer identification number	3 Social security wages	4 Social security tax withheld
	15,080.00	934.96
c Employer's name, address, and ZIP code	5 Medicare wages and tips	6 Medicare tax withheld
S2 BROTHERS, INC 2731 NATIONAL CIR GARLAND TX 75041	15,080.00	218.92
e Employee's first name and initial	Last name	Suff.
ANA MARIA	D. LA CRUZ	
14221 HERITAGE CIR # 3-209		
FARMERS BRANCH	TX 75234	
d Control number	7 Social security tips	8 Allocated tips
9	10 Dependent care benefits	11 Nonqualified plans
12a	14 Other	
12b		
12c		
12d		
13 Statutory employee <input type="checkbox"/>	Retirement plan <input type="checkbox"/>	Third-party sick pay <input type="checkbox"/>
15 State Employer's state ID number	16 State wages, tips, etc.	17 State income tax
18 Local wages, tips, etc.	19 Local income tax	20 Locality name

Form **W-2** Wage and Tax Statement **2015** Department of the Treasury-Internal Revenue Service  
Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return.

a Employee's SSN	1 Wages, tips, other compensation	2 Federal income tax withheld
OMB No. 1545-0008	15,080.00	
b Employer identification number	3 Social security wages	4 Social security tax withheld
	15,080.00	934.96
c Employer's name, address, and ZIP code	5 Medicare wages and tips	6 Medicare tax withheld
S2 BROTHERS, INC 2731 NATIONAL CIR GARLAND TX 75041	15,080.00	218.92
e Employee's first name and initial	Last name	Suff.
ANA MARIA	D. LA CRUZ	
14221 HERITAGE CIR # 3-209		
FARMERS BRANCH	TX 75234	
d Control number	7 Social security tips	8 Allocated tips
9	10 Dependent care benefits	11 Nonqualified plans
12a	14 Other	
12b		
12c		
12d		
13 Statutory employee <input type="checkbox"/>	Retirement plan <input type="checkbox"/>	Third-party sick pay <input type="checkbox"/>
15 State Employer's state ID number	16 State wages, tips, etc.	17 State income tax
18 Local wages, tips, etc.	19 Local income tax	20 Locality name

Form **W-2** Wage and Tax Statement **2015** Department of the Treasury-Internal Revenue Service  
Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return.





Form <b>W-2 Wage and Tax Statement</b> 2015		7 Social security tips		1 Wages, tips, other compensation 1,092.95		2 Federal income tax withheld 2.24	
c Employer's name, address, and ZIP code JOHNSTON TEMPORARY SERVICES P.O. BOX 9700 HOUSTON, TX 77213		8 Allocated tips		3 Social security wages 1,092.95		4 Social security tax withheld 67.76	
		9		5 Medicare wages and tips 1,092.95		6 Medicare tax withheld 15.85	
		10 Dependent care benefits		11 Nonqualified plans		12a See instructions for box 12 0.00	
e Employee's name, address, and ZIP code RODRIGUEZ, DIMAS 1910 S JOSEY LANE APT 159 Carrollton, TX 75006		13 Statutory employee Retirement plan Third-party sick pay		14 Other		12b	
		b Employer identification no. (EIN)				12c	
		a Employee's social security no.				12d	
15 State Employer's state ID number TX 13-548778-3		16 State wages, tips, etc. 1,092.95		17 State income tax 0.00		18 Local wages, tips, etc.	
				19 Local income tax		20 Locality name	

Copy B—To Be Filed With Employee's FEDERAL Tax Return. This information is being furnished to the Internal Revenue Service. OMB No. 1545-0008 38-2099803 Dept. of the Treasury — IRS Visit the IRS website at [www.irs.gov/efile](http://www.irs.gov/efile)

This information is being furnished to the Internal Revenue Service. If you are required to file a tax return, a negligence penalty or other sanction may be imposed on you if this income is taxable and you fail to report it.

Form <b>W-2 Wage and Tax Statement</b> 2015		7 Social security tips		1 Wages, tips, other compensation 1,092.95		2 Federal income tax withheld 2.24	
c Employer's name, address, and ZIP code JOHNSTON TEMPORARY SERVICES P.O. BOX 9700 HOUSTON, TX 77213		8 Allocated tips		3 Social security wages 1,092.95		4 Social security tax withheld 67.76	
		9		5 Medicare wages and tips 1,092.95		6 Medicare tax withheld 15.85	
		10 Dependent care benefits		11 Nonqualified plans		12a See instructions for box 12 0.00	
e Employee's name, address, and ZIP code RODRIGUEZ, DIMAS 1910 S JOSEY LANE APT 159 Carrollton, TX 75006		13 Statutory employee Retirement plan Third-party sick pay		14 Other		12b	
		b Employer identification no. (EIN)				12c	
		a Employee's social security no.				12d	
15 State Employer's state ID number TX 13-548778-3		16 State wages, tips, etc. 1,092.95		17 State income tax 0.00		18 Local wages, tips, etc.	
				19 Local income tax		20 Locality name	

Copy C—For EMPLOYEE'S RECORDS (See Notice to Employee on the back of Copy B.) OMB No. 1545-0008 38-2099803 Dept. of the Treasury — IRS

Form <b>W-2 Wage and Tax Statement</b> 2015		7 Social security tips		1 Wages, tips, other compensation 1,092.95		2 Federal income tax withheld 2.24	
c Employer's name, address, and ZIP code JOHNSTON TEMPORARY SERVICES P.O. BOX 9700 HOUSTON, TX 77213		8 Allocated tips		3 Social security wages 1,092.95		4 Social security tax withheld 67.76	
		9		5 Medicare wages and tips 1,092.95		6 Medicare tax withheld 15.85	
		10 Dependent care benefits		11 Nonqualified plans		12a See instructions for box 12 0.00	
e Employee's name, address, and ZIP code RODRIGUEZ, DIMAS 1910 S JOSEY LANE APT 159 Carrollton, TX 75006		13 Statutory employee Retirement plan Third-party sick pay		14 Other		12b	
		b Employer identification no. (EIN)				12c	
		a Employee's social security no.				12d	
15 State Employer's state ID number TX 13-548778-3		16 State wages, tips, etc. 1,092.95		17 State income tax 0.00		18 Local wages, tips, etc.	
				19 Local income tax		20 Locality name	

Copy 2—To Be Filed With Employee's State, City, or Local Income Tax Return OMB No. 1545-0008 38-2099803 Dept. of the Treasury — IRS

Form <b>W-2 Wage and Tax Statement</b> 2015		7 Social security tips		1 Wages, tips, other compensation 1,092.95		2 Federal income tax withheld 2.24	
c Employer's name, address, and ZIP code JOHNSTON TEMPORARY SERVICES P.O. BOX 9700 HOUSTON, TX 77213		8 Allocated tips		3 Social security wages 1,092.95		4 Social security tax withheld 67.76	
		9		5 Medicare wages and tips 1,092.95		6 Medicare tax withheld 15.85	
		10 Dependent care benefits		11 Nonqualified plans		12a See instructions for box 12 0.00	
e Employee's name, address, and ZIP code RODRIGUEZ, DIMAS 1910 S JOSEY LANE APT 159 Carrollton, TX 75006		13 Statutory employee Retirement plan Third-party sick pay		14 Other		12b	
		b Employer identification no. (EIN)				12c	
		a Employee's social security no.				12d	
15 State Employer's state ID number TX		16 State wages, tips, etc. 1,092.95		17 State income tax 0.00		18 Local wages, tips, etc.	
				19 Local income tax		20 Locality name	

Copy 2—To Be Filed With Employee's State, City, or Local Income Tax Return OMB No. 1545-0008 38-2099803 Dept. of the Treasury — IRS

BW24DWNA NTF 2579543

DEPOSITION  
EXHIBIT  
16

PENGAD 800-631-6889



## Garcia & King TRI TAX

1925 E Beltline Rd Suite 250  
Carrollton, TX 75006  
GK@Tritaxx.com  
Phone: (972)530-4444 | Fax: (972)530-4444

February 11, 2016

Dimas Rodriguez Inguanzo & Ana Maria D La Cruz  
1910 S Josey Apt 159  
Carrollton, TX 75006

Subject: Preparation of Your 2015 Tax Returns

Dimas Rodriguez Inguanzo & Ana Maria D La Cruz:

Thank you for choosing Garcia & King TRI TAX to assist you with your 2015 taxes. This letter confirms the terms of our engagement with you and outlines the nature and extent of the services we will provide.

We will prepare your 2015 federal and state income tax returns. We will depend on you to provide the information we need to prepare complete and accurate returns. We may ask you to clarify some items but will not audit or otherwise verify the data you submit. An Organizer is enclosed to help you collect the data required for your return. The Organizer will help you avoid overlooking important information. By using it, you will contribute to efficient preparation of your returns and help minimize the cost of our services.

We will perform accounting services only as needed to prepare your tax returns. Our work will not include procedures to find defalcations or other irregularities. Accordingly, our engagement should not be relied upon to disclose errors, fraud, or other illegal acts, though it may be necessary for you to clarify some of the information you submit. We will, of course, inform you of any material errors, fraud, or other illegal acts we discover.

The law imposes penalties when taxpayers underestimate their tax liability. Please call us if you have concerns about such penalties.

Should we encounter instances of unclear tax law, or of potential conflicts in the interpretation of the law, we will outline the reasonable courses of action and the risks and consequences of each. We will ultimately adopt, on your behalf, the alternative you select.

Our fee will be based on the time required at standard billing rates plus out-of-pocket expenses. Invoices are due and payable upon presentation. To the extent permitted by state law, an interest charge may be added to all accounts not paid within thirty (30) days.

We will return your original records to you at the end of this engagement. You should securely store these records, along with all supporting documents, canceled checks, etc., as these items may later be needed to prove accuracy and completeness of a return. We will retain copies of your records and our work papers for your engagement for seven years, after which these documents will be destroyed.

Our engagement to prepare your 2015 tax returns will conclude with the delivery of the completed returns to you (if paper-filing), or your signature and our subsequent submittal of your tax return (if e-filing). If you have not selected to e-file your returns with our office, you will be solely responsible to file the returns with the appropriate taxing authorities. Review all tax-return documents carefully before signing them.

To affirm that this letter correctly summarizes your understanding of the arrangements for this work, please

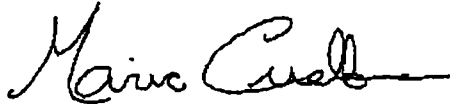


PL\_Docs 0054

enclosed copy of this letter in the space indicated and return it to us in the envelope provided.

We appreciate your confidence in us. Please call (972)530-4444 if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Maria Cuellar", with a long horizontal flourish extending to the right.

Maria Cuellar  
Garcia & King TRI TAX

(Both spouses must sign for preparation of joint returns.)

Accepted By:

\_\_\_\_\_  
Taxpayer

\_\_\_\_\_  
Spouse

\_\_\_\_\_  
Date

Account Transaction Summary		2015
Name(s) as shown on return DIMAS RODRIGUEZ INGUANZO & ANA LA CRUZ		Your ID Number XXX-XX-2745

**Account #1**

**Financial Institution Name** CHASE BANK  
**Routing Transit Number** 111000614  
**Account Number** 689765951  
**Account Type** Checking

<b>Federal Deposit</b>	926
<b>Net Deposit</b>	<u>926</u>

## PLEASE VERIFY BANK INFORMATION

1. Bank Name
2. Bank Routing Transit Number
3. Bank Account Number
4. Bank Account Type

This information is used to deposit your refund or to pay any amount due. If you have provided incorrect information, or you have closed the account, you are responsible.

I have reviewed the above information and certify that this information is correct and authorize Garcia & King TRI TAX to use this account to deposit my refund.

	Date	Date
--	------	------



Form

Department of the Treasury - Internal Revenue Service

**1040A****U.S. Individual Income Tax Return** (99)**2015**

IRS Use Only - Do not write or staple in this space.

Your first name and initial <b>DIMAS</b>		Last name <b>RODRIGUEZ INGUANZO</b>		OMB No. 1545-0074
If a joint return, spouse's first name and initial <b>ANA MARIA D</b>		Last name <b>LA CRUZ</b>		Your social security number [REDACTED]
Home address (number and street). <b>1910 S JOSEY</b>		Apt. no. <b>159</b>	Spouse's social security number [REDACTED]	
City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions). <b>CARROLLTON TX 75006</b>		Make sure the SSN(s) above and on line 6c are correct. Presidential Election Campaign Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund. <input type="checkbox"/> You <input type="checkbox"/> Spouse		
Foreign country name		Foreign province/state/country	Foreign postal code	

**Filing status**

1 ☐ Single

2 ☒ Married filing jointly (even if only one had income)

3 ☐ Married filing separately. Enter spouse's SSN above and full name here. ▼

4 ☐ Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here. ▼

5 ☐ Qualifying widow(er) with dependent child (see instructions)

Check only one box.

**Exemptions**

6 a ☒ Yourself. If someone can claim you as a dependent, do not check box 6a.

b ☒ Spouse

c Dependents:

(1) First name	Last name	(2) Dependent's social security number	(3) Dependent's relationship to you	(4) If child under age 17 qualifying for child tax credit (see instructions)	<input checked="" type="checkbox"/> lived with you <input type="checkbox"/> did not live with you due to divorce or separation (see instr) Dependents on 6c not entered above
[REDACTED]	[REDACTED]	[REDACTED]	SON	<input checked="" type="checkbox"/>	2
[REDACTED]	[REDACTED]	[REDACTED]	SON	<input type="checkbox"/>	
				<input type="checkbox"/>	Add numbers on lines above ► <b>4</b>
				<input type="checkbox"/>	
				<input type="checkbox"/>	

d Total number of exemptions claimed.

**Income**

Attach Form(s) W-2 here. Also attach Form(s) 1099-R if tax was withheld.

If you did not get a W-2, see instructions.

7	Wages, salaries, tips, etc. Attach Form(s) W-2.	7	29,708
8 a	Taxable interest. Attach Schedule B if required.	8 a	
b	Tax-exempt interest. Do not include on line 8a.	8 b	
9 a	Ordinary dividends. Attach Schedule B if required.	9 a	
b	Qualified dividends (see instructions).	9 b	
10	Capital gain distributions (see instructions).	10	
11 a	IRA distributions.	11 a	
11 b	Taxable amount (see instructions).	11 b	
12 a	Pensions and annuities.	12 a	
12 b	Taxable amount (see instructions).	12 b	
13	Unemployment compensation and Alaska Permanent Fund dividends.	13	
14 a	Social security benefits.	14 a	
14 b	Taxable amount (see instructions).	14 b	
15	Add lines 7 through 14b (far right column). This is your total income.	15	29,708

**Adjusted gross income**

16	Educator expenses (see instructions).	16	
17	IRA deduction (see instructions).	17	
18	Student loan interest deduction (see instructions).	18	
19	Tuition and fees. Attach Form 8917.	19	
20	Add lines 16 through 19. These are your total adjustments.	20	
21	Subtract line 20 from line 15. This is your adjusted gross income.	21	29,708

For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see separate instructions.

Form 1040A (2015)

EEA

PL\_Docs 0058



Form 1040A (2015) DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ

Page 2

**Tax, credits, and payments** 22 Enter the amount from line 21 (adjusted gross income). 22 29,708

23a Check ☐ You were born before January 2, 1951, ☐ Blind } Total boxes checked ☐ 23a ☐  
 if: ☐ Spouse was born before January 2, 1951, ☐ Blind }

b If you are married filing separately and your spouse itemizes deductions, check here ☐ 23b ☐

Standard Deduction for -  
 • People who check any box on line 23a or 23b or who can be claimed as a dependent, see instructions.

• All others:  
 Single or Married filing separately, \$6,300

Married filing jointly or Qualifying widow(er) \$12,600

Head of household, \$9,250

24 Enter your standard deduction. 24 12,600

25 Subtract line 24 from line 22. If line 24 is more than line 22, enter -0-. 25 17,108

26 Exemptions. Multiply \$4,000 by the number on line 6d. 26 16,000

27 Subtract line 26 from line 25. If line 26 is more than line 25, enter -0-. This is your **taxable income**. 27 1,108

28 Tax, including any alternative minimum tax (see instructions). 28 111

29 Excess advance premium tax credit repayment. Attach Form 8962. 29

30 Add lines 28 and 29. 30 111

31 Credit for child and dependent care expenses. Attach Form 2441. 31

32 Credit for the elderly or the disabled. Attach Schedule R. 32

33 Education credits from Form 8863, line 19. 33

34 Retirement savings contributions credit. Attach Form 8880. 34

35 Child tax credit. Attach Schedule 8812, if required. 35 111

36 Add lines 31 through 35. These are your **total credits**. 36 111

37 Subtract line 36 from line 30. If line 36 is more than line 30, enter -0-. 37 0

38 Health care: individual responsibility (see instructions). Full-year coverage ☐ 38

39 Add line 37 and line 38. This is your **total tax**. 39 0

40 Federal income tax withheld from Forms W-2 and 1099. 40 37

41 2015 estimated tax payments and amount applied from 2014 return. 41

If you have a qualifying child, attach Schedule EIC.

42a Earned income credit (EIC). 42a NO

b Nontaxable combat pay election. 42b

43 Additional child tax credit. Attach Schedule 8812. 43 889

44 American opportunity credit from Form 8863, line 8. 44

45 Net premium tax credit. Attach Form 8962. 45

46 Add lines 40, 41, 42a, 43, 44, and 45. These are your **total payments**. 46 926

**Refund**

Direct deposit? See instructions and fill in 48b, 48c, and 48d or Form 8888.

47 If line 46 is more than line 39, subtract line 39 from line 46. This is the amount you overpaid. 47 926

48a Amount of line 47 you want refunded to you. If Form 8888 is attached, check here ☐ 48a 926

b Routing number ☐ c Type: ☒ Checking ☐ Savings

d Account number ☐

49 Amount of line 47 you want applied to your 2016 estimated tax. 49

**Amount you owe**

50 Amount you owe. Subtract line 46 from line 39. For details on how to pay, see instructions. 50

51 Estimated tax penalty (see instructions). 51

**Third party designee**

Do you want to allow another person to discuss this return with the IRS (see instructions)? ☐ Yes. Complete the following. ☒ No

Designee's name \_\_\_\_\_ Phone no \_\_\_\_\_ Personal identification number (PIN) ☐

**Sign here**

Joint return? See instructions. Keep a copy for your records.

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and accurately list all amounts and sources of income I received during the tax year. Declaration of preparer (other than the taxpayer) is based on all information of which the preparer has any knowledge.

Your signature 82745 Date 02-11-2016 Your occupation \_\_\_\_\_ Daytime phone number 630-618-6741

Spouse's signature If a joint return, both must sign. 88837 Date 02-11-2016 Spouse's occupation \_\_\_\_\_ If the IRS sent you an Identity Protection PIN, enter it here (see inst.) ☐

Preparer's signature \_\_\_\_\_ Date 02-11-2016 Check ☐ if PTIN self-employed P01688771

**Paid preparer use only**

Print/Type preparer's name Maria Cuellar

Firm's name Garcia & King TRI TAX Firm's EIN ☐

Firm's address 1925 E Beltline Rd Suite 250 Carrollton, TX 75006 Phone no. 972-530-4444

EEA

Form 1040A (2015)  
PL Docs 0059



**Garcia & King TRI TAX**

1925 E Beltline Rd Suite 250  
 Carrollton, TX 75006  
 GK@Tritaxx.com  
 Phone: (972)530-4444 | Fax: (972)530-4444

Customer Name	Customer Information		
Dimas Rodriguez Inganzo & Ana Maria D La Cruz 1910 S Josey Apt 159 Carrollton, TX 75006	Invoice #		
	Date		February 11, 2016
	Phone		(630)618-6741
	E-mail		

Your 2015 tax return was prepared by Maria Cuellar.

Description		Fee
<b>Federal And Supplemental Forms</b>		
Form 1040A	U.S. Individual Income Tax Return	
Form 8812	Additional Child Tax Credit	
Form 8879	E-File Signature Authorization	
Form 9325	General Information for Electronic Filing	
Wksht TTLGI	All Source Gross Income Computation	
Form W-2	Wage and Tax Statement	
Form W-2	Wage and Tax Statement	
Form W-2	Wage and Tax Statement	
Wksht 8812	Form 8812 Worksheet - Child Tax Credit	
W-2 Listing	Listing of All Forms W-2	
Wksht CTC4	Form 8812 Worksheet - Earned Income Calc	

<b>Total Forms</b>	<b>11</b>	<b>Forms Subtotal</b>	<b>185.00</b>
		20% Discount	-37.00
		<b>Subtotal</b>	<b>148.00</b>
		<b>Total Balance Due</b>	<b>148.00</b>

Payment due upon receipt. Thank you for your business!

## Garcia & King TRI TAX

1925 E Beltline Rd Suite 250  
Carrollton, TX 75006  
GK@Tritaxx.com  
Phone: (972)530-4444 | Fax: (972)530-4444

February 11, 2016

Dimas Rodriguez Inguanzo & Ana Maria D La Cruz  
1910 S Josey Apt 159  
Carrollton, TX 75006

Your privacy is important to us. Please read the following privacy policy.

We collect nonpublic personal information about you from various sources, including:


- \* Interviews regarding your tax situation
- \* Applications, organizers, or other documents that supply such information as your name, address, telephone number, Social Security Number, number of dependents, income, and other tax-related data
- \* Tax-related documents you provide that are required for processing tax returns, such as Forms W-2, 1099R, 1099-INT and 1099-DIV, and stock transactions

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as requested by our clients or as required by law.

We restrict access to personal information concerning you, except to our employees who need such information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your personal information.

If you have any questions about our privacy policy, please contact us.

Sincerely,



Maria Cuellar  
Garcia & King TRI TAX

## Garcia & King TRI TAX

1925 E Bellline Rd Suite 250  
Carrollton, TX 75006  
GK@Tritax.com  
Phone: (972)530-4444 | Fax: (972)530-4444

February 11, 2016

Dimas Rodriguez Inganzo & Ana Maria D La Cruz  
1910 S Josey Apt 159  
Carrollton, TX 75006


Dimas Rodriguez Inganzo & Ana Maria D La Cruz:

Return Type	Refund/Balance Due	Transaction Method
Federal Income Tax	\$926 Refund	Direct Deposit to **0614

The following return(s) will be e-filed and do not need to be mailed to the taxing authority:

Federal Income Tax

Sincerely,



Maria Cuellar  
Garcia & King TRI TAX

**SEND A FRIEND!**

Name

Date

One of the nicest compliments our clients can give us is a referral.  
For each new paying client you refer to us, we will pay you \$20.  
Thank you for your business.

**Garcia & King TRI TAX**  
1925 E Beltline Rd Suite 250  
Carrollton, TX 75006  
(972) 530-4444

Your Name DIMAS RODRIGUEZ INGUANZO & A  
Address 1910 S JOSEY APT 159  
CARROLLTON, TX 75006

Preparer's  
Name Maria Cuellar

HAVE YOUR FRIENDS BRING THIS COUPON IN WITH THEIR TAX INFORMATION.

(subject to terms and conditions)

**SEND A FRIEND!**

Name

Date

One of the nicest compliments our clients can give us is a referral.  
For each new paying client you refer to us, we will pay you \$20.  
Thank you for your business.

**Garcia & King TRI TAX**  
1925 E Beltline Rd Suite 250  
Carrollton, TX 75006  
(972) 530-4444

Your Name DIMAS RODRIGUEZ INGUANZO & A  
Address 1910 S JOSEY APT 159  
CARROLLTON, TX 75006

Preparer's  
Name Maria Cuellar

HAVE YOUR FRIENDS BRING THIS COUPON IN WITH THEIR TAX INFORMATION.

(subject to terms and conditions)

**SEND A FRIEND!**

Name

Date

One of the nicest compliments our clients can give us is a referral.  
For each new paying client you refer to us, we will pay you \$20.  
Thank you for your business.

**Garcia & King TRI TAX**  
1925 E Beltline Rd Suite 250  
Carrollton, TX 75006  
(972) 530-4444

Your Name DIMAS RODRIGUEZ INGUANZO & A  
Address 1910 S JOSEY APT 159  
CARROLLTON, TX 75006

Preparer's  
Name Maria Cuellar

HAVE YOUR FRIENDS BRING THIS COUPON IN WITH THEIR TAX INFORMATION.

(subject to terms and conditions)

PL\_Docs 0063

**SCHEDULE 8812**  
**(Form 1040A or 1040)**Department of the Treasury  
Internal Revenue Service (99)**Child Tax Credit**

▶ Attach to Form 1040, Form 1040A, or Form 1040NR.

▶ Information about Schedule 8812 and its separate instructions is at

[www.irs.gov/schedule8812](http://www.irs.gov/schedule8812)

OMB No. 1545-0074

**2015**Attachment  
Sequence No. **47**

Name(s) shown on return

Your social security number

DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ

**Part I Filers Who Have Certain Child Dependent(s) with an ITIN (Individual Taxpayer Identification Number)****!**

Complete this part only for each dependent who has an ITIN and for whom you are claiming the child tax credit.

**CAUTION**

If your dependent is not a qualifying child for the credit, you cannot include that dependent in the calculation of this credit.

Answer the following questions for each dependent listed on Form 1040, line 6c; Form 1040A, line 6c; or Form 1040NR, line 7c, who has an ITIN (Individual Taxpayer Identification Number) and that you indicated is a qualifying child for the child tax credit by checking column (4) for that dependent.

- A**
- For the first dependent identified with an ITIN and listed as a qualifying child for the child tax credit, did this child meet the substantial presence test? See separate instructions.

☐ Yes ☐ No

- B**
- For the second dependent identified with an ITIN and listed as a qualifying child for the child tax credit, did this child meet the substantial presence test? See separate instructions.

☐ Yes ☐ No

- C**
- For the third dependent identified with an ITIN and listed as a qualifying child for the child tax credit, did this child meet the substantial presence test? See separate instructions.

☐ Yes ☐ No

- D**
- For the fourth dependent identified with an ITIN and listed as a qualifying child for the child tax credit, did this child meet the substantial presence test? See separate instructions.

☐ Yes ☐ No**Note:** If you have more than four dependents identified with an ITIN and listed as a qualifying child for the child tax credit, see separate instructions and check here . . . . . ☐**Part II Additional Child Tax Credit Filers**

- 1**
- If you file Form 2555 or 2555-EZ stop here, you cannot claim the additional child tax credit.

If you are required to use the worksheet in Pub. 972, enter the amount from line 8 of the Child Tax Credit Worksheet in the publication. Otherwise.

**1040 filers:** Enter the amount from line 6 of your Child Tax Credit Worksheet (see the Instructions for Form 1040, line 52).**1040A filers:** Enter the amount from line 6 of your Child Tax Credit Worksheet (see the Instructions for Form 1040A, line 35).**1040NR filers:** Enter the amount from line 6 of your Child Tax Credit Worksheet (see the Instructions for Form 1040NR, line 49).

<b>2</b> Enter the amount from Form 1040, line 52; Form 1040A, line 35; or Form 1040NR, line 49 . . . . .	<b>2</b>	111
<b>3</b> Subtract line 2 from line 1. If zero, stop; you cannot take this credit . . . . .	<b>3</b>	889
<b>4 a</b> Earned income (see separate instructions) . . . . .	<b>4a</b>	29,708
<b>b</b> Nontaxable combat pay (see separate instructions) . . . . .	<b>4b</b>	
<b>5</b> Is the amount on line 4a more than \$3,000? <input type="checkbox"/> No. Leave line 5 blank and enter -0- on line 6. <input checked="" type="checkbox"/> Yes. Subtract \$3,000 from the amount on line 4a. Enter the result . . . . .	<b>5</b>	26,708
<b>6</b> Multiply the amount on line 5 by 15% (.15) and enter the result . . . . . Next, do you have three or more qualifying children? <input checked="" type="checkbox"/> No. If line 6 is zero, stop; you cannot take this credit. Otherwise, skip Part III and enter the smaller of line 3 or line 6 on line 13. <input type="checkbox"/> Yes. If line 6 is equal to or more than line 3, skip Part III and enter the amount from line 3 on line 13. Otherwise, go to line 7.	<b>6</b>	4,006

For Paperwork Reduction Act Notice, see your tax return instructions.

Schedule 8812 (Form 1040A or 1040) 2015

EEA

PL\_Docs 0064

Schedule 8812 (Form 1040A or 1040) 2015

Page 2

**Part III Certain Filers Who Have Three or More Qualifying Children**

7	Withheld social security, Medicare, and Additional Medicare taxes from Form(s) W-2, boxes 4 and 6. If married filing jointly, include your spouse's amounts with yours. If your employer withheld or you paid Additional Medicare Tax or tier 1 RRTA taxes, see separate instructions . . . . .	7	
8	1040 filers: Enter the total of the amounts from Form 1040, lines 27 and 58, plus any taxes that you identified using code "UT" and entered on line 62.  1040A filers: Enter -0-. 1040NR filers: Enter the total of the amounts from Form 1040NR, lines 27 and 56, plus any taxes that you identified using code "UT" and entered on line 60.	8	
9	Add lines 7 and 8 . . . . .	9	
10	1040 filers: Enter the total of the amounts from Form 1040, lines 66a and 71.  1040A filers: Enter the total of the amount from Form 1040A, line 42a, plus any excess social security and tier 1 RRTA taxes withheld that you entered to the left of line 46 (see separate instructions).  1040NR filers: Enter the amount from Form 1040NR, line 67.	10	
11	Subtract line 10 from line 9. If zero or less, enter -0- . . . . .	11	
12	Enter the larger of line 6 or line 11 . . . . .	12	
Next, enter the smaller of line 3 or line 12 on line 13.			

**Part IV Additional Child Tax Credit**

13	This is your additional child tax credit . . . . .	13	889
----	--	----	-----

Enter this amount on  
Form 1040, line 67,  
Form 1040A, line 43, or  
Form 1040NR, line 64.

EEA

Schedule 8812 (Form 1040A or 1040) 2015

**Preparer's Summary of Affordable Care Act****2015**

Name(s) as shown on return

Social Security Number

**DIMAS RODRIGUEZ INGUANZO & ANA LA CRUZ**

## Definition of codes for each month:

MC - Marketplace Coverage - shown on screen 95A

OC - Other coverage - shown on screen 8965

ECN - Exemption Certificate Number - shown on screen 8965

EX - Exemption code claimed - shown on screen 8965 or

automatically applied by the software - see right column

blank - No coverage and no exemption - ISRP is due and  
computed on WK\_89651

Ex A - Coverage considered unaffordable

Ex B - Short coverage gap (less than 3 months)

Ex C - Noncitizen or was living abroad

Ex D - Member of health care sharing ministry

Ex E - Member of Indian tribe

Ex F - Incarcerated after disposition of charges

Ex G - Self-only unaffordable or nonMedicaid-expansion state

Ex H - Added to household or died during year

Name	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
<b>DIMAS RODRIGUEZ</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>
<b>ANA MARIA D LA C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>	<b>Ex C</b>
<b>ALEJANDRO RODRIG</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>
<b>DIMAS HERNANDEZ</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>	<b>OC</b>

Form <b>9325</b> (Rev. January 2016)	Department of the Treasury - Internal Revenue Service <b>Acknowledgement and General Information for Taxpayers Who File Returns Electronically</b>
---	---

Thank you for participating in IRS e-file.

Taxpayer name DIMAS RODRIGUEZ INGUANZO & ANA LA C

Taxpayer address (optional)

1910 S JOSEY APT 159  
CARROLLTON, TX 75006

1. ☒ Your federal income tax return for 2015 was filed electronically with the IRS Submission Processing Center. The electronic filing services were provided by Garcia & King TRI TAX.
2. ☐ Your return was accepted on \_\_\_\_\_ using a Personal Identification Number (PIN) as your electronic signature. You entered a PIN or authorized the Electronic Return Originator (ERO) to enter or generate a PIN for you. The Submission ID assigned to your return is \_\_\_\_\_.
3. ☐ Your return was accepted on \_\_\_\_\_. Allow 4 to 6 weeks for the processing of your return. The Earned Income Credit or a dependent's exemption on your return may be reduced or disallowed due to a child's name and social security number mismatch.
4. ☐ Your electronic funds withdrawal payment request was accepted for processing.
5. ☐ Your electronic funds withdrawal payment request was not accepted for processing. Refer to the "If You Owe Tax" section.
6. ☐ Your Form 4868, Application for Automatic Extension of Time to File U.S. Individual Income Tax Return, was accepted on \_\_\_\_\_. The Submission ID assigned to your extension is \_\_\_\_\_.

**DO NOT SEND A PAPER COPY OF YOUR RETURN TO THE IRS.  
IF YOU DO, IT WILL DELAY THE PROCESSING OF THE RETURN.**

#### **If You Need to Make a Change to Your Return**

If you need to make a change or correct the return you filed electronically, you should send a Form 1040X, Amended U.S. Individual Income Tax Return, to the IRS Submission Processing Center that processes paper returns for your area. The address is available at [www.irs.gov](http://www.irs.gov), or you can call the IRS toll-free at 1-800-829-1040.

#### **If You Need to Ask About Your Refund**

The IRS notifies your Electronic Return Originator (ERO) when your return is accepted, usually within 48 hours. If your return was not accepted, the IRS notifies your ERO of the reasons for rejection. If it has been more than three weeks since the IRS accepted your return and you have not received your refund, go to [www.irs.gov](http://www.irs.gov) and click on "Where's My Refund?" to view your refund status. Exception: If box 3 above is checked, please allow 4 to 6 weeks for processing of your return. A notice will be sent to you advising of changes to your return.

Also, you can call the TeleTax line at 1-800-829-4477, for automated refund information. You should have available the first social security number shown on your return, your filing status, and the exact amount of the refund you expect. TeleTax gives you the date for mailing or depositing your refund. You should receive your refund check within 30 days of the date given by TeleTax, or within one week of that date, if you chose direct deposit. If you do not receive it by then, or if TeleTax does not give you refund information, call the Refund Hotline at 1-800-829-1954.



The IRS uses refunds to cover overdue taxes and notifies you when this occurs. The Fiscal Service offsets refunds through the Treasury Offset Program to cover past due child support, federal agency non-tax debts such as student loans and state income tax obligations. Fiscal Service sends you an offset notice if it applies your refund or part of your refund to non-tax debts. If you have questions about the offset, contact the agency identified in the notice. You may also call the Treasury Offset Program Call Center at 1-800-304-3107, if you have additional questions.

#### **If You Owe Tax**

If your return has a balance due, you must pay the amount you owe by the prescribed due date. If you paid by electronic funds withdrawal (direct debit) or by credit card, no voucher is needed. The credit card service providers will charge a convenience fee based on the amount of taxes you are paying. The fees and the type of credit or debit cards accepted may vary between providers. You will be told the amount of the fee during the transaction and you will be given the option to either continue or end the transaction. For information on paying your taxes electronically, including by credit or debit card, go to [www.irs.gov/e-pay](http://www.irs.gov/e-pay).

If you are not paying electronically you may use Form 1040-V, Payment Voucher, which you can obtain from your Electronic Return Originator. If the IRS does not receive your payment by the prescribed due date, you will receive a notice that requests full payment of the tax due, plus penalties and interest. If you can not pay the amount in full, complete Form 9465, Installment Agreement Request, which you may file electronically. To apply for an installment agreement online, go to [www.irs.gov](http://www.irs.gov). You may also order Form 9465 by calling 1-800-TAX-FORM (1-800-829-3676). If approved, the IRS charges a user fee to set up an installment agreement.

#### **If You Need to Inquire About Your Electronic Funds Withdrawal Payment**

You may call 1-888-353-4537 to inquire about the status of your electronic funds withdrawal payment. If there is a change to the bank account information included on your return, you should call this number to cancel a scheduled payment. You should have available the social security number of the first person listed on the tax return, the payment amount, and the bank account number. Cancellation requests must be received no later than 11:59 p.m. E.T. two business days prior to the scheduled payment date.

#### **Tax Refund Related Financial Products**

Financial institutions offer a variety of financial products to taxpayers based on their refunds. Contracts for financial products are between you and the financial institution. The IRS is not associated with the contract. If you have questions about tax refund related products, contact your Electronic Return Originator or the lender.

#### **Instructions for Electronic Return Originators**

**Line 2 - PIN Presence Indicator** - Check box 2 if the taxpayer entered a PIN or authorized the ERO to enter or generate the PIN for the taxpayer, and the Acknowledgement File PIN Presence Indicator is a "Practitioner PIN," "Self-Select PIN" or "Online Filer PIN." Form 8879, IRS e-file Signature Authorization, is required if the ERO enters or generates the PIN or if the Practitioner PIN method is used. Use Form 8453, U.S. Individual Income Tax Transmittal for an IRS e-file Return, to send required paper forms or supporting documentation listed next to the form check boxes (do not send Forms W-2, W-2G, or 1099R).

**Line 3 - Exception Processing** - Check box 3 if the Acknowledgement File Acceptance Code equals "Exception." The acceptance code indicates that this return has been previously rejected and this subsequent submission still has invalid data.

**Line 4 - Payment Acknowledgement Literal** - Check box 4 if the taxpayer requested to use electronic funds withdrawal to pay the balance due, and the Acknowledgement File Payment Acknowledgement Literal field equals "Payment Request Received."

**Line 5 - Payment Acknowledgement Literal** - Check box 5 if the taxpayer requested to use electronic funds withdrawal to pay the balance due, and the Acknowledgement File Payment Acknowledgement Literal field does not equal "Payment Request Received." If box 5 is checked, inform the taxpayer that he/she must pay by check, money order, debit card, or credit card.

**Note:** EROs can use the Acknowledgement File information, translated by the transmitter, to complete Form 9325.

AS RODRIGUEZ INGUANZO & ANA LA CRUZ

## Notes about the return

PAGE 1

Name(s)

DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ

Your social security number

NAME TOO LONG TO E-FILE.

Name was shortened to: D RODRIGUEZ INGUANZO & A LA CRUZ

Per Publication 1346, error reject code 0033, the name line cannot have more than 35 characters. The name was automatically shortened for the return to be e-filed successfully.

016 VERIFY CTC ELIGIBILITY. Child Tax Credit cannot be taken for a child over the age of 16.

039 STATE WAGES IGNORED: You have left the "ST" field and the "Employer's state ID number" field blank on screen W2. The resident state selected on screen 1 is a state without income taxes; therefore, the amount entered in box 17, "State wages," on screen W2 will be disregarded by the software.

134 W-2 ID DIFFERS FROM 1040 ID. The W2 screen contains an ITIN/SSN in the override field. We suggest going to the SCH to attach a note (select item "X" from the "Type of attachment..." drop list) to accompany the return explaining why the ID numbers do not match. The note will appear in View mode as an "EF NOTE."

Use Field Help on the W2 screen for more information.

<b>EFSTATUS</b>	<b>EF Transmission Status</b> (Keep for your records)	<b>2015</b>																																																																						
Name(s) as shown on return <b>DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ</b>		Your social security number [REDACTED]																																																																						
<p>The following will be transmitted to the IRS.      <input checked="" type="checkbox"/> 1040    <input type="checkbox"/> 4868    <input type="checkbox"/> 2350    <input type="checkbox"/> 9465    <input type="checkbox"/> Form 56</p>																																																																								
<p>The following state returns will be transmitted:</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> </table>			_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
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<p>The following returns have been suppressed or are not eligible and will NOT be transmitted.</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> </table>			_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____							
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Forms 1040, 1040A  
1040NR

## Child Tax Credit Worksheet

Keep for your records.

Name(s) as shown on return

Your social security number

DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ

**CAUTION!** • To be a qualifying child for the child tax credit, the child must be under age 17 at the end of 2015 and meet the other requirements listed in instructions.

• If you do not have a qualifying child, you cannot claim the child tax credit.

- Part 1**
- Number of qualifying children: 1 X \$1,000. Enter the result. 1,000
  - Enter the amount from Form 1040, line 38; Form 1040A, line 22; or Form 1040NR, line 37. 29,708
  - 1040 Filers. Enter the total of any -
    - Exclusion of income from Puerto Rico, and
    - Amounts from Form 2555, lines 45 and 50; Form 2555-EZ, line 18; and Form 4563, line 15.
 1040A and 1040NR Filers. Enter -0-. 3
  - Add lines 2 and 3. Enter the total. 29,708
  - Enter the amount shown below for your filing status.
    - Married filing jointly - \$110,000
    - Single, head of household, or qualifying widow(er) - \$75,000
    - Married filing separately - \$55,0005 110,000
  - Is the amount on line 4 more than the amount on line 5?
    - ☒ No. Leave line 6 blank. Enter -0- on line 7.
    - ☐ Yes. Subtract line 5 from line 4.
 If the result is not a multiple of \$1,000, increase it to the next multiple of \$1,000. For example, increase \$425 to \$1,000, increase \$1,025 to \$2,000, etc. 6
  - Multiply the amount on line 6 by 5% (.05). Enter the result. 7 0
  - Is the amount on line 1 more than the amount on line 7?
    - ☐ No. STOP

You cannot take the child tax credit on Form 1040, line 52; Form 1040A, line 35; or Form 1040NR, line 49. You also cannot take the additional child tax credit on Form 1040, line 67; Form 1040A, line 43; or Form 1040NR, line 64. Complete the rest of your Form 1040, Form 1040A, or Form 1040NR.

☒ Yes. Subtract line 7 from line 1. Enter the result. Go to Part 2 below. 8 1,000

- Part 2**
- Enter the amount from Form 1040, line 47; Form 1040A, line 30; or Form 1040NR, line 45. 9 111
  - Add the following amounts from:
 

Form 1040	or	Form 1040A	or	Form 1040NR	
Line 48				Line 46	+
Line 49		Line 31		Line 47	+
Line 50		Line 33			+
Line 51		Line 34		Line 48	+
Form 5695, line 30					+
Form 8910, line 15					+
Form 8936, line 23					+
Schedule R, line 22					+

Enter the total. 10

- Are you claiming any of the following credits?
  - Mortgage interest credit, Form 8396.
  - Adoption credit, Form 8839.
  - Residential energy efficient property credit, Form 5695, Part I.
  - District of Columbia first-time homebuyer credit, Form 8859.
  - ☒ No. Enter the amount from line 10.
  - ☐ Yes. If you are filing Form 2555 or 2555-EZ, enter the amount from line 10. Otherwise, complete the Line 11 Worksheet, later, to figure the amount to enter here.
- Subtract line 11 from line 9. Enter the result. 12 111
- Is the amount on line 8 of this worksheet more than the amount on line 12?
  - ☐ No. Enter the amount from line 8.
  - ☒ Yes. Enter the amount from line 12. See the TIP below. 13 111

This is your  
child tax credit.

## TIP

You may be able to take the additional child tax credit on Form 1040, line 67; Form 1040A, line 43; or Form 1040NR, line 64, only if you answered "Yes" on line 13.

- First, complete your Form 1040 through line 66a (also complete line 71), Form 1040A through line 42a, or Form 1040NR through line 63 (also, complete line 67).
- Then, use Parts II through IV of Schedule 8812 to figure any additional child tax credit.

Enter this amount on  
Form 1040, line 52;  
Form 1040A, line 35;  
or Form 1040NR, line 49.

## 1040 and 1040NR Filers - Earned Income Worksheet

2015

(Keep for your records)

Name(s) as shown on return

Your social security number

DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ

**Before you begin:**

- Use this worksheet only if you were sent here from the Line 11 Worksheet earlier in this publication or line 4a of Schedule 8812, Child Tax Credit.
- Disregard community property laws when figuring the amounts to enter on this worksheet.
- If married filing jointly, include your spouse's amounts with yours when completing this worksheet.

1. a.	Enter the amount from Form 1040, line 7, or Form 1040NR, line 8	1a.	29,708
b.	Enter the amount of any nontaxable combat pay received. Also enter this amount on Schedule 8812, line 4b. This amount should be shown in Form(s) W-2, box 12, with code Q	1b.	
Next, if you are filing Schedule C, C-EZ, F, or SE, or you received a Schedule K-1 (Form 1065 or Form 1065-B), go to line 2a. Otherwise, skip lines 2a through 2e and go to line 3.			
2. a.	Enter any statutory employee income reported on line 1 of Schedule C or C-EZ	2a.	
b.	Enter any net profit or (loss) from Schedule C, line 31; Schedule C-EZ, line 3; Schedule K-1 (Form 1065), box 14, code A (other than farming); and Schedule K-1 (Form 1065-B), box 9, code J1.* Reduce any Schedule K-1 amounts as described in the instructions for completing Schedule SE in the Partner's Instructions for Schedule K-1. Do not include on this line any statutory employee income or any other amounts exempt from self-employment tax. Options and commodities dealers must add any gain or subtract any loss (in the normal course of dealing in or trading section 1256 contracts) from section 1256 contracts or related property	2b.	
c.	Enter any net farm profit or (loss) from Schedule F, line 34, and from farm partnerships, Schedule K-1 (Form 1065), box 14, code A.* Reduce any Schedule K-1 amounts as described in the instructions for completing Schedule SE in the Partner's Instructions for Schedule K-1. Do not include on this line any amounts exempt from self-employment tax	2c.	
d.	If you used the farm optional method to figure net earnings from self-employment, enter the amount from Schedule SE, Section B, line 15. Otherwise, skip this line and enter on line 2e the amount from line 2c	2d.	
e.	If line 2c is a profit, enter the smaller of line 2c or line 2d. If line 2c is a (loss), enter the (loss) from line 2c	2e.	
3.	Combine lines 1a, 1b, 2a, 2b, and 2e. If zero or less, stop. Do not complete the rest of this worksheet. Instead, enter -0- on line 2 of the Line 11 Worksheet or line 4a of Schedule 8812, whichever applies	3.	29,708
4.	Enter any amount included on line 1a that is:		
a.	A scholarship or fellowship grant not reported on Form W-2	4a.	
b.	For work done while an inmate in a penal institution (enter "PRI" and this amount on the dotted line next to line 7 of Form 1040 or line 8 of Form 1040NR)	4b.	
c.	A pension or annuity from a nonqualified deferred compensation plan or a nongovernmental section 457 plan (enter "DFC" and this amount on the dotted line next to line 7 of Form 1040 or line 8 of Form 1040NR). This amount may be shown in box 11 of your Form W-2. If you received such an amount but box 11 is blank, contact your employer for the amount received as a pension or annuity	4c.	
5.	Enter the amount from Form 1040, line 27, or Form 1040NR, line 27	5.	
6.	Add lines 4a through 4c and 5	6.	
7.	Subtract line 6 from line 3	7.	29,708

- If you were sent here from the Line 11 Worksheet, enter this amount on line 2 of that worksheet.
- If you were sent here from Schedule 8812, enter this amount on line 4a of that form.

\* If you have any Schedule K-1 amounts and you are not required to file Schedule SE, complete the appropriate line(s) of Schedule SE, Section A. Put your name and social security number on Schedule SE and attach it to your return.

**Carryover Worksheet**  
**List of items that will carryover to the 2016 tax return**  
 (Keep for your records)

**2015**

Name(s) as shown on return

Your social security number

DIMAS RODRIGUEZ INGUANZO & ANA LA CRUZ**Itemized Deductions**

Carryover Amount

Contributions subject to 100% of AGI limitations	_____
Contributions subject to 50% of AGI limitations	_____
Contributions subject to 30% of AGI limitations (50% capital gains appreciated property)	_____
Contributions subject to 30% of AGI limitations	_____
Contributions subject to 20% of AGI limitations (30% capital gains appreciated property)	_____
Taxable state and local refunds to Form 1040, line 10	_____
State/local taxes paid in 2016 to flow to the Schedule A	_____
Preparer Fee to flow to the Schedule A	148
State donations and contributions carryover	_____
State overpayment applied to next year	_____

**Expenses**

Office in home operating expenses	_____
Office in home excess casualty losses and depreciation	_____
Disallowed investment interest expense	AMT _____ Reg. Tax _____
Section 179 expense	_____
Operating expenses, from Form WK_E, Sch E - Rental limitation on deductions when used for personal use	_____
Excess depreciation, from Form WK_E, Sch E - Rental limitation on deductions when used for personal use	_____

**Losses**

Short-term capital loss	_____
Long-term capital loss	_____
Net operating loss	AMT _____ Reg. Tax _____
Nonrecaptured net section 1231 losses	_____

**Credits**

Mortgage interest credit	_____
Credit for prior year minimum tax	_____
Foreign Tax credit	AMT _____ Reg. Tax _____
District of Columbia first time home owner's credit	_____
Res. energy efficient property credit	_____

**Other**

Overpayment applied to next year's estimates	_____
Federal tax liability for 2210 calculation	0
State tax liability for state 2210 calculation	_____
IRA basis	Taxpayer _____ Spouse _____

**Passive Activity**

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**At Risk Limitations**

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

<b>Account Transaction Summary</b>		<b>2015</b>				
<small>Name(s) as shown on return</small>	<small>Your ID Number</small>					
DIMAS RODRIGUEZ INGUANZO & ANA LA CRUZ	XXX-XX-2745					
<p><b>Account #1</b></p> <p><b>Financial Institution Name</b> CHASE BANK</p> <p><b>Routing Transit Number</b> [REDACTED] 0614</p> <p><b>Account Number</b> [REDACTED] 0614</p> <p><b>Account Type</b> Checking</p> <table style="width: 100%;"> <tr> <td style="width: 60%;">Federal Deposit</td> <td style="text-align: right; border-top: 1px solid black;">926</td> </tr> <tr> <td>Net Deposit</td> <td style="text-align: right; border-top: 1px solid black;">926</td> </tr> </table>			Federal Deposit	926	Net Deposit	926
Federal Deposit	926					
Net Deposit	926					
<p>PLEASE VERIFY BANK INFORMATION</p> <ol style="list-style-type: none"> <li>1. Bank Name</li> <li>2. Bank Routing Transit Number</li> <li>3. Bank Account Number</li> <li>4. Bank Account Type</li> </ol> <p>This information is used to deposit your refund or to pay any amount due. If you have provided incorrect information, or you have closed the account, you are responsible.</p> <p>I have reviewed the above information and certify that this information is correct and authorize Garcia &amp; King TRI TAX to use this account to deposit my refund.</p> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="border-top: 1px solid black; width: 30%;"></div> <div style="border-top: 1px solid black; width: 30%; text-align: center;">Date</div> <div style="border-top: 1px solid black; width: 30%;"></div> <div style="border-top: 1px solid black; width: 30%; text-align: center;">Date</div> </div>						

DD\_PMT.LD

PL\_Docs 0075



Form **8965****Health Coverage Exemptions**

OMB No. 1545-0074

Department of the Treasury  
Internal Revenue Service

▶ Attach to Form 1040, Form 1040A, or Form 1040EZ.

▶ Information about Form 8965 and its separate instructions is at [www.irs.gov/form8965](http://www.irs.gov/form8965).**2015**Attachment  
Sequence No. **75**

Name as shown on return

DIMAS RODRIGUEZ INGUANZO

Your social security number

Complete this form if you have a Marketplace-granted coverage exemption or you are claiming a coverage exemption on your return.

**Part I** Marketplace-Granted Coverage Exemptions for Individuals. If you and/or a member of your tax household have an exemption granted by the Marketplace, complete Part I.

	(a) Name of Individual	(b) SSN	(c) Exemption Certificate Number
1			
2			
3			
4			
5			
6			

**Part II** Coverage Exemptions Claimed on Your Return for Your Household7a Are you claiming an exemption because your household income is below the filing threshold? ☐ Yes ☒ Nob Are you claiming a hardship exemption because your gross income is below the filing threshold? ☐ Yes ☒ No**Part III** Coverage Exemptions Claimed on Your Return for Individuals. If you and/or a member of your tax household are claiming an exemption on your return, complete Part III.

	(a) Name of Individual	(b) SSN	(c) Exemption Type	(d) Full Year	(e) Jan	(f) Feb	(g) Mar	(h) Apr	(i) May	(j) June	(k) July	(l) Aug	(m) Sept	(n) Oct	(o) Nov	(p) Dec
8			C	X												
9			C	X												
10																
11																
12																
13																

For Privacy Act and Paperwork Reduction Act Notice, see your tax return instructions.

Form 8965 (2015)

EEA

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Federal Supporting Statements		2015 PG01
Name(s) as shown on return DIMAS RODRIGUEZ INGUANZO & ANA LA CRUZ		Your Social Security Number [REDACTED]
<u>All Source Gross Income</u>		WK_TTLGI
<u>Description</u>		<u>Amount</u>
Wages and tips		<u>29,708</u>
<b>Total</b>		<u><u>29,708</u></u>

STM.LD

PL\_Docs 0078

Employee's SSN		1 Wages, tips, other compensation		2 Federal income tax withheld	
[REDACTED]		15,080.00		[REDACTED]	
OMB No. 1545-0008		3 Social security wages		4 Social security tax withheld	
[REDACTED]		15,080.00		934.96	
b Employer identification number		5 Medicare wages and tips		6 Medicare tax withheld	
[REDACTED]		15,080.00		218.92	
c Employer's name, address, and ZIP code					
S2 BROTHERS, INC 2731 NATIONAL CIR  GARLAND TX 75041					
e Employee's first name and initial		Last name		Suff.	
ANA MARIA		DIA CRUZ		[REDACTED]	
14221 HERITAGE CIR # 3-209  FARMERS BRANCH TX 75234					
f Employee's address and Zip code					
d Control number		7 Social security tips		8 Allocated tips	
9		10 Dependent care benefits		11 Nonqualified plans	
12a		14 Other			
12b		[REDACTED]			
12c		[REDACTED]			
12d		[REDACTED]			
13 Statutory employee <input type="checkbox"/>		Retirement plan <input type="checkbox"/>		Third-party sick pay <input type="checkbox"/>	
15 State Employer's state ID number		16 State wages, tips, etc.		17 State income tax	
[REDACTED]		[REDACTED]		[REDACTED]	
18 Local wages, tips, etc.		19 Local income tax		20 Locality name	
[REDACTED]		[REDACTED]		[REDACTED]	

Form **W-2** Wage and Tax Statement **2014** Copy C - For EMPLOYEE'S RECORDS.

This information is being furnished to the Internal Revenue Service. If you are required to file a tax return, a negligence penalty or other sanction may be imposed on you if this income is taxable and you fail to report it.

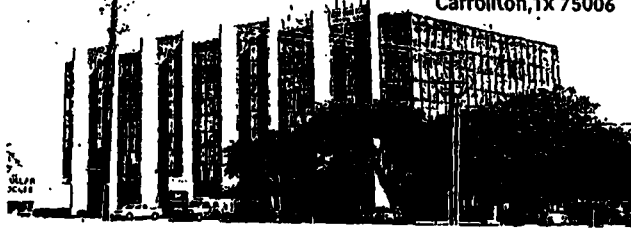
Employee's SSN		1 Wages, tips, other compensation		2 Federal income tax withheld	
[REDACTED]		15,080.00		[REDACTED]	
OMB No. 1545-0008		3 Social security wages		4 Social security tax withheld	
[REDACTED]		15,080.00		934.96	
b Employer identification number		5 Medicare wages and tips		6 Medicare tax withheld	
[REDACTED]		15,080.00		218.92	
c Employer's name, address, and ZIP code					
S2 BROTHERS, INC 2731 NATIONAL CTR  GARLAND TX 75041					
e Employee's first name and initial		Last name		Suff.	
ANA MARIA		DIA CRUZ		[REDACTED]	
14221 HERITAGE CIR # 3-209  FARMERS BRANCH TX 75234					
f Employee's address and Zip code					
d Control number		7 Social security tips		8 Allocated tips	
9		10 Dependent care benefits		11 Nonqualified plans	
12a		14 Other			
12b		[REDACTED]			
12c		[REDACTED]			
12d		[REDACTED]			
13 Statutory employee <input type="checkbox"/>		Retirement plan <input type="checkbox"/>		Third-party sick pay <input type="checkbox"/>	
15 State Employer's state ID number		16 State wages, tips, etc.		17 State income tax	
[REDACTED]		[REDACTED]		[REDACTED]	
18 Local wages, tips, etc.		19 Local income tax		20 Locality name	
[REDACTED]		[REDACTED]		[REDACTED]	

Form **W-2** Wage and Tax Statement **2014** Department of Treasury-Internal Revenue Service  
Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return.

GARCIA  
& KING

 **TRI TAX**  
INCOME TAX • REAL ESTATE

**972-530-4444** 1925 E. Beltline Rd Suite 250 (2nd Flr)  
Carrollton, TX 75006



## BANK PRODUCT INFORMATION

BANK RBEFIN 807105Date Application Signed 02-09-2015

Franchise/Network EFIN \_\_\_\_\_

## Taxpayer(s) Information:

Taxpayer DIMAS RODRIGUEZ INGUANZOSSN XXX-XX-2745 DOB [REDACTED]

Home Phone (Evening) \_\_\_\_\_

Work Phone (Daytime) 630-618-6741

Cell Phone \_\_\_\_\_

Email \_\_\_\_\_

Spouse ANA MARIA D LA CRUZSSN XXX-XX-8837 DOB [REDACTED]

Home Phone (Evening) \_\_\_\_\_

Work Phone (Daytime) \_\_\_\_\_

Cell Phone \_\_\_\_\_

Email \_\_\_\_\_

## Dollar Summary

This section is intended to provide estimated payment and fee amounts based on anticipated amounts. These are only estimates. Actual amounts will be determined once the product request has been processed. Anticipated state disbursements are in no particular order. Some states disburse funds in a more timely manner than others. State disbursements may arrive prior to federal disbursements.

## Refund Transfer

Federal Refund \$ 2,001.00Selected Federal Amount \$ 2,001.00

Selected State Amount \$ \_\_\_\_\_

Account Fee 35.00

Additional Deposit Fee \_\_\_\_\_

Total Projected Bank Fee \$ 35.00Tax Preparation 192.00

Franchise/Network Fee paid to \_\_\_\_\_

Total Preparer Fees \$ 192.00Software Fee paid to Drake Software 13.95

Additional Fee withheld on behalf of:

RAY E KING JR 36.00

Audit protection fee \_\_\_\_\_

Audit protection franchise/network fee paid to \_\_\_\_\_

Audit protection document prep fee paid to \_\_\_\_\_

Total Other Fees \$ 49.95

## Projected Checks (after fees)

Refund Transfer (Approx. 2 wks) \$ 1,724.05

State Refund Transfer \_\_\_\_\_

State Refund Transfer \_\_\_\_\_

State Refund Transfer \_\_\_\_\_

## Other Information:

Account Data for Refund Transfer to Personal Account:

RTN \_\_\_\_\_

DAN \_\_\_\_\_

Type of Account: ☐ Checking ☐ Savings

## Money Clip Card:

Account Number \_\_\_\_\_

Alerts via text message: ☐ Yes ☒ No

Taxpayer Signature \_\_\_\_\_

Spouse Signature \_\_\_\_\_

Digitally signed by DIMAS  
RODRIGUEZ INGUANZO@RB INFO  
Date: 2015.02.09 17:00:32 -06:00

Date \_\_\_\_\_

Date \_\_\_\_\_

PL\_Docs 0081



Form **8879**

## IRS e-file Signature Authorization

OMB No. 1545-0074

Department of the Treasury  
Internal Revenue Service

▶ Do not send to the IRS. This is not a tax return.

▶ Keep this form for your records.

▶ Information about Form 8879 and its instructions is at [www.irs.gov/form8879](http://www.irs.gov/form8879).**2014**

Submission Identification Number (SID)

00-807105-501115

Taxpayer's name

DIMAS RODRIGUEZ INGUANZO

Social security number

Spouse's name

ANA MARIA D LA CRUZ

Spouse's social security number

**Part I Tax Return Information - Tax Year Ending December 31, 2014** (Whole Dollars Only)

1	Adjusted gross income (Form 1040, line 38; Form 1040A, line 22; Form 1040EZ, line 4)	1	28,394
2	Total tax (Form 1040, line 63; Form 1040A, line 39; Form 1040EZ, line 12)	2	
3	Federal income tax withheld (Form 1040, line 64; Form 1040A, line 40; Form 1040EZ, line 7)	3	1
4	Refund (Form 1040, line 76a; Form 1040A, line 48a; Form 1040EZ, line 13a; Form 1040-SS, Part I, line 13a)	4	2,001
5	Amount you owe (Form 1040, line 78; Form 1040A, line 50; Form 1040EZ, line 14)	5	

**Part II Taxpayer Declaration and Signature Authorization (Be sure you get and keep a copy of your return)**

Under penalties of perjury, I declare that I have examined a copy of my electronic individual income tax return and accompanying schedules and statements for the tax year ending December 31, 2014, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that the amounts in Part I above are the amounts from my electronic income tax return. I consent to allow my intermediate service provider, transmitter, or electronic return originator (ERO) to send my return to the IRS and to receive from the IRS (a) an acknowledgement of receipt or reason for rejection of the transmission, (b) the reason for any delay in processing the return or refund, and (c) the date of any refund. If applicable, I authorize the U.S. Treasury and its designated Financial Agent to initiate an ACH electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of my federal taxes owed on this return and/or a payment of estimated tax, and the financial institution to debit the entry to this account. This authorization is to remain in full force and effect until I notify the U.S. Treasury Financial Agent to terminate the authorization. To revoke (cancel) a payment, I must contact the U.S. Treasury Financial Agent at 1-888-353-4537. Payment cancellation requests must be received no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment. I further acknowledge that the personal identification number (PIN) below is my signature for my electronic income tax return and, if applicable, my Electronic Funds Withdrawal Consent.

Taxpayer's PIN: check one box only

RTN=083901809 Acct=Ends in 2745

☒ I authorize Garcia & King TRI TAX to enter or generate my PIN 82745

ERO firm name

as my signature on my tax year 2014 electronically filed income tax return.

Enter five digits, but do not enter all zeros

☐ I will enter my PIN as my signature on my tax year 2014 electronically filed income tax return. Check this box **only** if you are entering your own PIN and your return is filed using the Practitioner PIN method. The ERO must complete Part III below.

Your signature ▶

Digitally signed by DIMAS  
RODRIGUEZ INGUANZO@8879  
Date: 2015.02.09 17:06:48 -06:00

Date ▶

Spouse's PIN: check one box only

☒ I authorize Garcia & King TRI TAX to enter or generate my PIN 99999

ERO firm name

as my signature on my tax year 2014 electronically filed income tax return.

Enter five digits, but do not enter all zeros

☐ I will enter my PIN as my signature on my tax year 2014 electronically filed income tax return. Check this box **only** if you are entering your own PIN and your return is filed using the Practitioner PIN method. The ERO must complete Part III below.

Spouse's signature ▶

Digitally signed by ANA MARIA D  
LA CRUZ@8879  
Date: 2015.02.09 17:05:22 -06:00

Date ▶

**Practitioner PIN Method Returns Only - continue below****Part III Certification and Authentication - Practitioner PIN Method Only**

ERO's EFIN/PIN. Enter your six-digit EFIN followed by your five-digit self-selected PIN.

807105-80710

Do not enter all zeros

I certify that the above numeric entry is my PIN, which is my signature for the tax year 2014 electronically filed income tax return for the taxpayer(s) indicated above. I confirm that I am submitting this return in accordance with the requirements of the Practitioner PIN method and Publication 1345, Handbook for Authorized IRS e-file Providers of Individual Income Tax Returns.

ERO's signature ▶ Ray King Jr

Date ▶

**ERO Must Retain This Form - See Instructions****Do Not Submit This Form to the IRS Unless Requested To Do So**

For Paperwork Reduction Act Notice, see your tax return instructions.

EEA

PENGAD 800-631-6989

**DEPOSITION  
EXHIBIT**18

**Consent to Disclosure of Tax Return Information**

("we," "us" and "our")

Printed name of tax preparer \_\_\_\_\_

Federal law requires this consent form be provided to you.


Unless authorized by law, we cannot disclose your tax return information to third parties for purposes other than the preparation and filing of your tax return without your consent. If you consent to the disclosure of your tax return information, Federal law may not protect your tax return information from further use or distribution.

You are not required to complete this form to engage our tax return preparation services. If we obtain your signature on this form by conditioning our tax return preparation services on your consent, your consent will not be valid. If you agree to the disclosure of your tax return information, your consent is valid for the amount of time that you specify. If you do not specify the duration of your consent, your consent is valid for one year from the date of signature.

You have indicated that you are interested in applying for a Refund Transfer from Republic Bank & Trust Company ("RB"). In order to have your bank product application processed by RB, we must disclose all of your 2014 tax return information to RB. You may request a more limited disclosure of tax return information, provided that you authorize disclosure of all of the information required by RB to consider your application.

If you would like us to disclose your 2014 tax return information to RB for this purpose, please sign and date your consent to the disclosure of your tax return information.

By signing below, you (including each of you if there is more than one taxpayer) authorize us to disclose to RB all of your 2014 tax return information so that RB can evaluate and process your application for a bank product. You understand that if you are not willing to authorize us to share your tax information with RB, you will not be able to obtain a bank product from RB, but you can still choose to have your tax return prepared and filed by us for a fee.

Printed Name of Taxpayer: DIMAS RODRIGUEZ INGUANZOTaxpayer Signature:  Digitally signed by DIMAS RODRIGUEZ INGUANZO@RB 7218D  
Date: 2015.02.09 17:07:20 -06:00 Date: \_\_\_\_\_Printed Name of Joint Taxpayer: ANA MARIA D LA CRUZJoint Taxpayer Signature:  Digitally signed by ANA MARIA D LA CRUZ@RB 7218D  
Date: 2015.02.09 17:06:14 -06:00 Date: \_\_\_\_\_

If you believe your tax return information has been disclosed or used improperly in a manner unauthorized by law or without your permission, you may contact the Treasury Inspector General for Tax Administration (TIGTA) by telephone at 1-800-366-4484, or by email at [complaints@tigta.treas.gov](mailto:complaints@tigta.treas.gov).



February 09, 2015

Dimas Rodriguez Inganzo & Ana Maria D La Cruz  
1910 S Josey Apt 159  
Carrollton, TX 75006

Subject: Preparation of Your 2014 Tax Returns

Dimas Rodriguez Inganzo & Ana Maria D La Cruz:

Thank you for choosing to assist you with your 2014 taxes. This letter confirms the terms of our engagement with you and outlines the nature and extent of the services we will provide.

We will prepare your 2014 federal and state income tax returns. We will depend on you to provide the information we need to prepare complete and accurate returns. We may ask you to clarify some items but will not audit or otherwise verify the data you submit. An Organizer is enclosed to help you collect the data required for your return. The Organizer will help you avoid overlooking important information. By using it, you will contribute to efficient preparation of your returns and help minimize the cost of our services.

We will perform accounting services only as needed to prepare your tax returns. Our work will not include procedures to find defalcations or other irregularities. Accordingly, our engagement should not be relied upon to disclose errors, fraud, or other illegal acts, though it may be necessary for you to clarify some of the information you submit. We will, of course, inform you of any material errors, fraud, or other illegal acts we discover.

The law imposes penalties when taxpayers underestimate their tax liability. Please call us if you have concerns about such penalties.

Should we encounter instances of unclear tax law, or of potential conflicts in the interpretation of the law, we will outline the reasonable courses of action and the risks and consequences of each. We will ultimately adopt, on your behalf, the alternative you select.

Our fee will be based on the time required at standard billing rates plus out-of-pocket expenses. Invoices are due and payable upon presentation. To the extent permitted by state law, an interest charge may be added to all accounts not paid within thirty (30) days.

We will return your original records to you at the end of this engagement. You should securely store these records, along with all supporting documents, canceled checks, etc., as these items may later be needed to prove accuracy and completeness of a return. We will retain copies of your records and our work papers for your engagement for seven years, after which these documents will be destroyed.

Our engagement to prepare your 2014 tax returns will conclude with the delivery of the completed returns to you (if paper-filing), or your signature and our subsequent submittal of your tax return (if e-filing). If you have not selected to e-file your returns with our office, you will be solely responsible to file the returns with the appropriate taxing

authorities. Review all tax-return documents carefully before signing them.

To affirm that this letter correctly summarizes your understanding of the arrangements for this work, please sign the enclosed copy of this letter in the space indicated and return it to us in the envelope provided.

We appreciate your confidence in us. Please call if you have questions.

Sincerely,

(Both spouses must sign for preparation of joint returns.)

Accepted By:

\_\_\_\_\_  
Taxpayer

\_\_\_\_\_  
Spouse

\_\_\_\_\_  
Date

February 09, 2015

Dimas Rodriguez Inganzo & Ana Maria D La Cruz  
1910 S Josey Apt 159  
Carrollton, TX 75006

Dimas Rodriguez Inganzo & Ana Maria D La Cruz:

Return Type	Refund/Balance Due	Transaction Method
Federal Income Tax	\$2,001 Refund	RT

Sign and date these return(s) and mail them on or before the filing deadline to the address provided:

**Federal Income Tax**  
Department of the Treasury  
Internal Revenue Service  
Austin, TX 73301-0015

Sincerely,

**SEND A FRIEND!**

Name

Date

One of the nicest compliments our clients can give us is a referral.  
For each new paying client you refer to us, we will pay you \$20.  
Thank you for your business.

Your Name DIMAS RODRIGUEZ INGUANZO & AAddress 1910 S JOSEY APT 159  
CARROLLTON, TX 75006Preparer's  
Name

HAVE YOUR FRIEND BRING THIS COUPON IN WITH THEIR TAX INFORMATION.

(subject to terms and conditions)

**SEND A FRIEND!**

Name

Date

One of the nicest compliments our clients can give us is a referral.  
For each new paying client you refer to us, we will pay you \$20.  
Thank you for your business.

Your Name DIMAS RODRIGUEZ INGUANZO & AAddress 1910 S JOSEY APT 159  
CARROLLTON, TX 75006Preparer's  
Name

HAVE YOUR FRIEND BRING THIS COUPON IN WITH THEIR TAX INFORMATION.

(subject to terms and conditions)

**SEND A FRIEND!**

Name

Date

One of the nicest compliments our clients can give us is a referral.  
For each new paying client you refer to us, we will pay you \$20.  
Thank you for your business.

Your Name DIMAS RODRIGUEZ INGUANZO & AAddress 1910 S JOSEY APT 159  
CARROLLTON, TX 75006Preparer's  
Name

HAVE YOUR FRIEND BRING THIS COUPON IN WITH THEIR TAX INFORMATION.

(subject to terms and conditions)

Form

Department of the Treasury - Internal Revenue Service

**1040A****U.S. Individual Income Tax Return** (99)**2014**

IRS Use Only - Do not write or staple in this space.

Your first name and initial <b>DIMAS</b>		Last name <b>RODRIGUEZ INGUANZO</b>		OMB No. 1545-0074 Your social security number [REDACTED]	
If a joint return, spouse's first name and initial <b>ANA MARIA D</b>		Last name <b>LA CRUZ</b>		Spouse's social security number [REDACTED]	
Home address (number and street). If you have a P.O. box, see instructions. <b>1910 S JOSEY</b>				Apt. no. <b>159</b>	
City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions). <b>CARROLLTON TX 75006</b>				Make sure the SSN(s) above and on line 6c are correct. Presidential Election Campaign Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund. <input type="checkbox"/> You <input type="checkbox"/> Spouse	
Foreign country name		Foreign province/state/country			

**Filing status**

1 ☐ Single

2 ☒ Married filing jointly (even if only one had income)

3 ☐ Married filing separately. Enter spouse's SSN above and full name here. ▼

4 ☐ Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here. ▼

5 ☐ Qualifying widow(er) with dependent child (see instructions)

Check only one box.

**Exemptions**

6 a ☒ Yourself. If someone can claim you as a dependent, do not check box 6a.

b ☒ Spouse

c Dependents:

(1) First name	Last name	(2) Dependent's social security number	(3) Dependent's relationship to you	(4) If child under age 17 qualifying for child tax credit (see instructions)
[REDACTED]			SON	<input checked="" type="checkbox"/>
			SON	<input type="checkbox"/>
			SON	<input type="checkbox"/>
			DAUGHTER	<input checked="" type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

If more than six dependents, see instructions.

Boxes checked on 6a and 6b: **2**

No. of children on 6c who:

- lived with you: **4**
- did not live with you due to divorce or separation (see instr):

Dependents on 6c not entered above:

d Total number of exemptions claimed. **6**

Add numbers on lines above

**Income**

Attach Form(s) W-2 here. Also attach Form(s) 1099-R if tax was withheld.

If you did not get a W-2, see instructions.

7 Wages, salaries, tips, etc. Attach Form(s) W-2.		7	<b>28,394</b>
8 a Taxable interest. Attach Schedule B if required.		8a	
b Tax-exempt interest. Do not include on line 8a.		8b	
9 a Ordinary dividends. Attach Schedule B if required.		9a	
b Qualified dividends (see instructions).		9b	
10 Capital gain distributions (see instructions).		10	
11 a IRA distributions.	11a	11b Taxable amount (see instructions).	11b
12 a Pensions and annuities.	12a	12b Taxable amount (see instructions).	12b
13 Unemployment compensation and Alaska Permanent Fund dividends.		13	
14 a Social security benefits.	14a	14b Taxable amount (see instructions).	14b
15 Add lines 7 through 14b (far right column). This is your total income.		15	<b>28,394</b>

**Adjusted gross income**

16 Educator expenses (see instructions).	16	
17 IRA deduction (see instructions).	17	
18 Student loan interest deduction (see instructions).	18	
19 Tuition and fees. Attach Form 8917.	19	
20 Add lines 16 through 19. These are your total adjustments.	20	
21 Subtract line 20 from line 15. This is your adjusted gross income.	21	<b>28,394</b>

For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see separate instructions.

Form 1040A (2014)

EEA

PL\_Docs 0088

Form 1040A (2014) DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ

Page 2

<b>Tax, credits, and payments</b>	22	Enter the amount from line 21 (adjusted gross income).	22	28,394
	23a	Check <input type="checkbox"/> You were born before January 2, 1950, <input type="checkbox"/> Blind } Total boxes checked <input type="checkbox"/> 23a <input type="checkbox"/>		
		if: <input type="checkbox"/> Spouse was born before January 2, 1950, <input type="checkbox"/> Blind }		
	b	If you are married filing separately and your spouse itemizes deductions, check here <input type="checkbox"/> 23b <input type="checkbox"/>		
<b>Standard Deduction for -</b> • People who check any box on line 23a or 23b or who can be claimed as a dependent, see instructions. • All others: Single or Married filing separately, \$6,200 Married filing jointly or Qualifying widow(er) \$12,400 Head of household, \$9,100	24	Enter your standard deduction.	24	12,400
	25	Subtract line 24 from line 22. If line 24 is more than line 22, enter -0-.	25	15,994
	26	Exemptions. Multiply \$3,950 by the number on line 6d.	26	23,700
	27	Subtract line 26 from line 25. If line 26 is more than line 25, enter -0-.		
		This is your taxable income.	27	0
	28	Tax, including any alternative minimum tax (see instructions).	28	0
	29	Excess advance premium tax credit repayment. Attach Form 8962.	29	
	30	Add lines 28 and 29.	30	
	31	Credit for child and dependent care expenses. Attach Form 2441.	31	
	32	Credit for the elderly or the disabled. Attach Schedule R.	32	
	33	Education credits from Form 8863, line 19.	33	
	34	Retirement savings contributions credit. Attach Form 8880.	34	
	35	Child tax credit. Attach Schedule 8812, if required.	35	
	36	Add lines 31 through 35. These are your total credits.	36	
	37	Subtract line 36 from line 30. If line 36 is more than line 30, enter -0-.	37	0
38	Health care: individual responsibility (see instructions). Full-year coverage <input type="checkbox"/>	38		
39	Add line 37 and line 38. This is your total tax.	39	0	
	40	Federal income tax withheld from Forms W-2 and 1099.	40	1
	41	2014 estimated tax payments and amount applied from 2013 return.	41	
If you have a qualifying child, attach Schedule EIC.	42a	Earned income credit (EIC).	42a	NO
	b	Nontaxable combat pay election. 42b <input type="checkbox"/>		
	43	Additional child tax credit. Attach Schedule 8812.	43	2,000
	44	American opportunity credit from Form 8863, line 8.	44	
	45	Net premium tax credit. Attach Form 8962.	45	
	46	Add lines 40, 41, 42a, 43, 44, and 45. These are your total payments.	46	2,001
<b>Refund</b>	47	If line 46 is more than line 39, subtract line 39 from line 46. This is the amount you overpaid.	47	2,001
	48a	Amount of line 47 you want refunded to you. If Form 8888 is attached, check here <input type="checkbox"/>	48a	2,001
	b	Routing number <input type="text"/> c Type: <input checked="" type="checkbox"/> Checking <input type="checkbox"/> Savings		
	d	Account number <input type="text"/>		
	49	Amount of line 47 you want applied to your 2015 estimated tax.	49	
<b>Amount you owe</b>	50	Amount you owe. Subtract line 46 from line 39. For details on how to pay, see instructions.	50	
	51	Estimated tax penalty (see instructions).	51	
<b>Third party designee</b>	Do you want to allow another person to discuss this return with the IRS (see instructions)? <input type="checkbox"/> Yes. Complete the following. <input checked="" type="checkbox"/> No			
	Designee's name <input type="text"/>	Phone no <input type="text"/>	Personal identification number (PIN) <input type="text"/>	
<b>Sign here</b>	Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and accurately list all amounts and sources of income I received during the tax year. Declaration of preparer (other than the taxpayer) is based on all information of which the preparer has any knowledge.			
	Your signature <input type="text"/>	Date <input type="text"/>	Your occupation <input type="text"/>	Daytime phone number <input type="text"/>
Joint return? See instructions. Keep a copy for your records.	Spouse's signature. If a joint return, both must sign. <input type="text"/>	Date <input type="text"/>	Spouse's occupation <input type="text"/>	If the IRS sent you an Identity Protection PIN, enter it here (see inst.) <input type="text"/>
	Preparer's signature <input type="text"/>	Date <input type="text"/>	Check <input type="checkbox"/> self-employed <input type="checkbox"/> if PTIN <input type="text"/>	
<b>Paid preparer use only</b>	Print/Type preparer's name <input type="text"/>			
	Firm's name <input type="text"/>	Firm's EIN <input type="text"/>		
	Firm's address <input type="text"/>	Phone no. <input type="text"/>		

EEA

Form 1040A (2014)

PL\_Docs 0089

Customer Name	Customer Information	
Dimas Rodriguez Inganzo & Ana Maria D La Cruz 1910 S Josey Apt 159 Carrollton, TX 75006		
	Date:	February 09, 2015
	Phone:	(630)618-6741
	E-mail:	

Your 2014 tax return was prepared by .

Description of Charges		Price
<b>Federal And Supplemental Forms</b>		
Form 1040A	U.S. Individual Income Tax Return	
Form 8812	Additional Child Tax Credit	
Form 8879	E-File Signature Authorization	
Form 9325	General Information for Electronic Filing	
Wksht TTLGI	All Source Gross Income Computation	
Form W-2	Wage and Tax Statement	
Form W-2	Wage and Tax Statement	
Fin Asst Fee	Financial Product Assistance Fee	
Wksht 8812	Form 8812 Worksheet - Child Tax Credit	
Wksht CTC4	Form 8812 Worksheet - Earned Income Calc	

<b>Total Forms</b>	<b>10</b>	<b>Forms Subtotal</b>	<b>240.00</b>
		20% Discount	-48.00
		<b>Subtotal</b>	<b>192.00</b>
		<b>Total Balance Due</b>	<b>192.00</b>

Like Us:  
[www.Facebook.com/EasyRefund](http://www.Facebook.com/EasyRefund)

February 09, 2015

Dimas Rodriguez Inguanzo & Ana Maria D La Cruz  
1910 S Josey Apt 159  
Carrollton, TX 75006

Your privacy is important to us. Please read the following privacy policy.

We collect nonpublic personal information about you from various sources, including:

- \* Interviews regarding your tax situation
- \* Applications, organizers, or other documents that supply such information as your name, address, telephone number, Social Security Number, number of dependents, income, and other tax-related data
- \* Tax-related documents you provide that are required for processing tax returns, such as Forms W-2, 1099R, 1099-INT and 1099-DIV, and stock transactions

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as requested by our clients or as required by law.

We restrict access to personal information concerning you, except to our employees who need such information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your personal information.

If you have any questions about our privacy policy, please contact us.

Sincerely,



**SCHEDULE 8812**  
**(Form 1040A or 1040)**Department of the Treasury  
Internal Revenue Service (99)  
Name(s) shown on return**Child Tax Credit**▶ Attach to Form 1040, Form 1040A, or Form 1040NR.  
▶ Information about Schedule 8812 and its separate instructions is at  
[www.irs.gov/schedule8812](http://www.irs.gov/schedule8812).

OMB No. 1545-0074

**2014**Attachment  
Sequence No. **47**

Your social security number

**DIMAS RODRIGUEZ INGUANZO & ANA LA CRUZ****Part I Filers Who Have Certain Child Dependent(s) with an ITIN (Individual Taxpayer Identification Number)**

- Complete this part only for each dependent who has an ITIN and for whom you are claiming the child tax credit.  
If your dependent is not a qualifying child for the credit, you cannot include that dependent in the calculation of this credit.

**CAUTION**

Answer the following questions for each dependent listed on Form 1040, line 6c; Form 1040A, line 6c; or Form 1040NR, line 7c, who has an ITIN (Individual Taxpayer Identification Number) and that you indicated is a qualifying child for the child tax credit by checking column (4) for that dependent.

- A For the first dependent identified with an ITIN and listed as a qualifying child for the child tax credit, did this child meet the substantial presence test? See separate instructions.

☐ Yes ☐ No

- B For the second dependent identified with an ITIN and listed as a qualifying child for the child tax credit, did this child meet the substantial presence test? See separate instructions.

☐ Yes ☐ No

- C For the third dependent identified with an ITIN and listed as a qualifying child for the child tax credit, did this child meet the substantial presence test? See separate instructions.

☐ Yes ☐ No

- D For the fourth dependent identified with an ITIN and listed as a qualifying child for the child tax credit, did this child meet the substantial presence test? See separate instructions.

☐ Yes ☐ No

Note: If you have more than four dependents identified with an ITIN and listed as a qualifying child for the child tax credit, see the instructions and check here ☐

**Part II Additional Child Tax Credit Filers**

1	1040 filers: Enter the amount from line 6 of your Child Tax Credit Worksheet (see the Instructions for Form 1040, line 52).		
	1040A filers: Enter the amount from line 6 of your Child Tax Credit Worksheet (see the Instructions for Form 1040A, line 35).		
	1040NR filers: Enter the amount from line 6 of your Child Tax Credit Worksheet (see the Instructions for Form 1040NR, line 49).		
	If you used Pub. 972, enter the amount from line 8 of the Child Tax Credit Worksheet in the publication.		
2	Enter the amount from Form 1040, line 52; Form 1040A, line 35; or Form 1040NR, line 49	2	
3	Subtract line 2 from line 1. If zero, stop; you cannot take this credit	3	2,000
4a	Earned income (see separate instructions)	4a	28,394
b	Nontaxable combat pay (see separate instructions)	4b	
5	Is the amount on line 4a more than \$3,000?		
	<input type="checkbox"/> No. Leave line 5 blank and enter -0- on line 6.		
	<input checked="" type="checkbox"/> Yes. Subtract \$3,000 from the amount on line 4a. Enter the result	5	25,394
6	Multiply the amount on line 5 by 15% (.15) and enter the result	6	3,809
	Next, do you have three or more qualifying children?		
	<input checked="" type="checkbox"/> No. If line 6 is zero, stop; you cannot take this credit. Otherwise, skip Part III and enter the smaller of line 3 or line 6 on line 13.		
	<input type="checkbox"/> Yes. If line 6 is equal to or more than line 3, skip Part III and enter the amount from line 3 on line 13. Otherwise, go to line 7.		

For Paperwork Reduction Act Notice, see your tax return instructions.

Schedule 8812 (Form 1040A or 1040) 2014

EEA

Schedule 8812 (Form 1040A or 1040) 2014

Page 2

**Part III Certain Filers Who Have Three or More Qualifying Children**

7 Withheld social security, Medicare, and Additional Medicare taxes from Form(s) W-2, boxes 4 and 6. If married filing jointly, include your spouse's amounts with yours. If your employer withheld or you paid Additional Medicare Tax or tier 1 RRTA taxes, see separate instructions . . . . .	7		
8 1040 filers: Enter the total of the amounts from Form 1040, lines 27 and 58, plus any taxes that you identified using code "UT" and entered on line 62.	8		
1040A filers: Enter -0-.			
1040NR filers: Enter the total of the amounts from Form 1040NR, lines 27 and 56, plus any taxes that you identified using code "UT" and entered on line 60.			
9 Add lines 7 and 8 . . . . .	9		
10 1040 filers: Enter the total of the amounts from Form 1040, lines 66a and 71.			
1040A filers: Enter the total of the amount from Form 1040A, line 42a, plus any excess social security and tier 1 RRTA taxes withheld that you entered to the left of line 46 (see separate instructions).	10		
1040NR filers: Enter the amount from Form 1040NR, line 67.			
11 Subtract line 10 from line 9. If zero or less, enter -0- . . . . .			11
12 Enter the larger of line 6 or line 11 . . . . .			12
Next, enter the smaller of line 3 or line 12 on line 13.			

**Part IV Additional Child Tax Credit**

13 This is your additional child tax credit . . . . .	13	2,000
Enter this amount on Form 1040, line 67, Form 1040A, line 43, or Form 1040NR, line 64.		

SEA

Schedule 8812 (Form 1040A or 1040) 2014

Form **9325**  
(Rev. January 2014)

Department of the Treasury - Internal Revenue Service

**Acknowledgement and General Information for  
Taxpayers Who File Returns Electronically**

Thank you for participating in IRS e-file.

Taxpayer name DIMAS RODRIGUEZ INGUANZO & ANA LA C

Taxpayer address (optional)

1910 S JOSEY APT 159CARROLLTON, TX 75006

1. ☒ Your federal income tax return for 2014 was filed electronically with the AUSTIN Submission Processing Center. The electronic filing services were provided by Garcia & King TRI TAX.
2. ☐ Your return was accepted on \_\_\_\_\_ using a Personal Identification Number (PIN) as your electronic signature. You entered a PIN or authorized the Electronic Return Originator (ERO) to enter or generate a PIN for you. The Submission ID assigned to your return is \_\_\_\_\_.
3. ☐ Your return was accepted on \_\_\_\_\_. Allow 4 to 6 weeks for the processing of your return. The Earned Income Credit or a dependent's exemption on your return may be reduced or disallowed due to a child's name and social security number mismatch.
4. ☐ Your electronic funds withdrawal payment was accepted.
5. ☐ Your electronic funds withdrawal payment was not accepted. You must pay the balance due by the prescribed due date. Refer to the "If You Owe Tax" section.
6. ☐ Your Form 4868, Application for Automatic Extension of Time to File U.S. Individual Income Tax Return, was accepted on \_\_\_\_\_. The Submission ID assigned to your extension is \_\_\_\_\_.

**PLEASE DO NOT SEND A PAPER COPY OF YOUR RETURN TO THE IRS.  
IF YOU DO, IT WILL DELAY THE PROCESSING OF THE RETURN.**

**If You Need to Make a Change to Your Return**

If you need to make a change or correct the return you filed electronically, you should send a Form 1040X, Amended U.S. Individual Income Tax Return, to the IRS Submission Processing Center that processes paper returns for your area. The address is available at [www.irs.gov](http://www.irs.gov), or you can call the IRS toll-free at 1-800-829-1040.

**If You Need to Ask About Your Refund**

The IRS notifies your *Electronic Return Originator* (ERO) when your return is accepted, usually within 48 hours. If your return was not accepted, the IRS notifies your ERO of the reasons for rejection. If it has been more than three weeks since the IRS accepted your return and you have not received your refund, go to [www.irs.gov](http://www.irs.gov) and click on "Where's My Refund?" to view your refund status. Exception: If box 3 above is checked, please allow 4 to 6 weeks for processing of your return. A notice will be sent to you advising of changes to your return.

Also, you can call the TeleTax line at 1-800-829-4477, for automated refund information. You should have available the first social security number shown on your return, your filing status, and the exact amount of the refund you expect. TeleTax gives you the date for mailing or depositing your refund. You should receive your refund check within 30 days of the date given by TeleTax, or within one week of that date, if you chose direct deposit. If you do not receive it by then, or if TeleTax does not give your refund information, call the Refund Hotline at 1-800-829-1954.

The IRS uses refunds to cover overdue taxes and notifies you when this occurs. The Fiscal Service offsets refunds through the Treasury Offset Program to cover past due child support, federal agency non-tax debts such as student loans and state income tax obligations. Fiscal Service sends you an offset notice if it applies your refund or part of your refund to non-tax debts. If you have questions about the offset, contact the agency identified in the notice. You may also call the Treasury Offset Program Call Center at 1-800-304-3107, if you have additional questions.

### **If You Owe Tax**

If your return has a balance due, you must pay the amount you owe by the prescribed due date. If you paid by electronic funds withdrawal (direct debit) or by credit card, no voucher is needed. The credit card service providers will charge a convenience fee based on the amount of taxes you are paying. The fees and the type of credit or debit cards accepted may vary between providers. You will be told the amount of the fee during the transaction and you will be given the option to either continue or end the transaction. For information on paying your taxes electronically, including by credit or debit card, go to [www.irs.gov/e-pay](http://www.irs.gov/e-pay).

If you are not paying electronically you may use Form 1040-V, Payment Voucher, which you can obtain from your Electronic Return Originator. If the IRS does not receive your payment by the prescribed due date, you will receive a notice that requests full payment of the tax due, plus penalties and interest. If you can not pay the amount in full, complete Form 9465, Installment Agreement Request, which you may file electronically. To apply for an installment agreement online, go to [www.irs.gov](http://www.irs.gov). You may also order Form 9465 by calling 1-800-TAX-FORM (1-800-829-3676). If approved, the IRS charges a user fee to set up an installment agreement.

### **If You Need to Inquire About Your Electronic Funds Withdrawal Payment**

You may call 1-888-353-4537 to inquire about the status of your electronic funds withdrawal payment. If there is a change to the bank account information included on your return, you should call this number to cancel a scheduled payment. You should have available the social security number of the first person listed on the tax return, the payment amount, and the bank account number. Cancellation requests must be received no later than 11:59 p.m. E.T. two business days prior to the scheduled payment date.

### **Tax Refund Related Financial Products**

Financial institutions offer a variety of financial products to taxpayers based on their refunds. Contracts for financial products are between you and the financial institution. The IRS is not associated with the contract. **If you have questions about tax refund related products, contact your Electronic Return Originator or the lender.**

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### **Instructions for Electronic Return Originators**

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**Line 2 - PIN Presence Indicator** - Check box 2 if the taxpayer entered a PIN or authorized the ERO to enter or generate the PIN for the taxpayer, and the Acknowledgement File PIN Presence Indicator is a "Practitioner PIN," "Self-Select PIN" or "Online Filer PIN." Form 8879, IRS e-file Signature Authorization, is required if the ERO enters or generates the PIN or if the Practitioner PIN method is used. Use Form 8453, U.S. Individual Income Tax Transmittal for an IRS e-file Return, to send required paper forms or supporting documentation listed next to the form check boxes (do not send Forms W-2, W-2G, or 1099R).

**Line 3 - Exception Processing** - Check box 3 if the Acknowledgement File Acceptance Code equals "Exception." The acceptance code indicates that this return has been previously rejected and this subsequent submission still has invalid data.

**Line 4 - Payment Acknowledgement Literal** - Check box 4 if the taxpayer requested to use electronic funds withdrawal to pay the balance due, and the Acknowledgement File Payment Acknowledgement Literal field equals "Payment Request Received."

**Line 5 - Payment Acknowledgement Literal** - Check box 5 if the taxpayer requested to use electronic funds withdrawal to pay the balance due, and the Acknowledgement File Payment Acknowledgement Literal field does not equal "Payment Request Received." If box 5 is checked, inform the taxpayer that he/she must pay by check, money order, debit card, or credit card.

**Note:** EROs can use the Acknowledgement File information, translated by the transmitter, to complete Form 9325.

DIMAS RODRIGUEZ INGUANZO & ANA LA CRUZ

## Notes about the return

PAGE 1

Name(s)

DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ

Your social security number

NAME TOO LONG TO E-FILE.

Name was shortened to: D RODRIGUEZ INGUANZO & A LA CRUZ

Per Publication 1346, error reject code 0033, the name line cannot have more than 35 characters. The name was automatically shortened for the return to be e-filed successfully.

016 VERIFY CTC ELIGIBILITY. Child Tax Credit cannot be taken for a child over the age of 16.

039 STATE WAGES IGNORED: You have left the "ST" field and the "Employer's state ID number" field blank on screen W2. The resident state selected on screen 1 is a state without income taxes; therefore, the amount entered in box 17, "State wages," on screen W2 will be disregarded by the software.

134 W-2 ID DIFFERS FROM 1040 ID. The W2 screen contains an ITIN/SSN in the override field. We suggest going to the SCH to attach a note (select item "X" from the "Type of attachment..." drop list) to accompany the return explaining why the ID numbers do not match. The note will appear in View mode as an "EF NOTE."

Use Field Help on the W2 screen for more information.

221 DEPENDENT NOT MARKED AS STUDENT. A dependent between the ages of 19 and 24 is not designated on the return as a student. You may want to check the dependent's status with your client.

439 HEALTH CARE COVERAGE EXEMPTION "G". Coverage exemption "G" is available to eliminate the Individual Shared Responsibility Payment (ISRP) for people who lived, at any time during the tax year, in a state that did not expand Medicaid and whose household income is less than 138% of the federal poverty level (see bottom of WK\_89652). The states that did not expand Medicaid coverage are: AL, AK, FL, GA, ID, IN, KS, LA, ME, MO, MS, MT, NC, NE, NH, OK, PA, SC, SD, TN, TX, UT, VA, WY, and WI. Because the resident state is one of these qualifying states, the program has applied coverage exemption "G" to everyone on the return. If a person on the tax return did not live in any of these states at any time during the tax year, create a screen 8965 for that person and select "X" from the drop list in the "Exemption being claimed on return" column, to prevent that person from claiming coverage exemption "G".

<b>EFSTATUS</b>	<b>EF Transmission Status</b> (Keep for your records)	<b>2014</b>																																																																																																																																												
Name(s) as shown on return <b>DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ</b>		Your social security number <div style="background-color: black; width: 100px; height: 1.2em;"></div>																																																																																																																																												
<p>The following will be transmitted to the IRS.      <input type="checkbox"/> 1040    <input type="checkbox"/> 4868    <input type="checkbox"/> 2350    <input type="checkbox"/> 9465    <input type="checkbox"/> Form 56</p> <hr/> <p>The following state returns will be transmitted:</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> </table> <hr/> <p>The following returns have been suppressed or are not eligible and will NOT be transmitted.</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> </table> <hr/> <p><b>EF Notes</b></p> <p>The Federal 1040 has a Message Page.</p>			_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
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PL\_Docs 0097

Forms 1040, 1040A

**Child Tax Credit Worksheet**

1040NR

Keep for your records.

Name(s) as shown on return

Your social security number

**DIMAS RODRIGUEZ INGUANZO & ANA LA CRUZ****CAUTION!** • To be a qualifying child for the child tax credit, the child must be under age 17 at the end of 2014 and meet the other requirements listed in instructions.

• If you do not have a qualifying child, you cannot claim the child tax credit.

**Part 1**

1. Number of qualifying children: 2 X \$1,000. Enter the result. 1 2,000

2. Enter the amount from Form 1040, line 38; Form 1040A, line 22; or Form 1040NR, line 37. 2 28,394

3. 1040 Filers. Enter the total of any -  
 • Exclusion of income from Puerto Rico, and  
 • Amounts from Form 2555, lines 45 and 50; Form 2555-EZ, line 18; and Form 4563, line 15.  
 1040A and 1040NR Filers. Enter -0-.

4. Add lines 2 and 3. Enter the total. 4 28,394

5. Enter the amount shown below for your filing status.  
 • Married filing jointly - \$110,000  
 • Single, head of household, or qualifying widow(er) - \$75,000  
 • Married filing separately - \$55,000

6. Is the amount on line 4 more than the amount on line 5?  
☒ No. Leave line 6 blank. Enter -0- on line 7.  
☐ Yes. Subtract line 5 from line 4.

If the result is not a multiple of \$1,000, increase it to the next multiple of \$1,000.  
 For example, increase \$425 to \$1,000, increase \$1,025 to \$2,000, etc.

7. Multiply the amount on line 6 by 5% (.05). Enter the result. 7 0

8. Is the amount on line 1 more than the amount on line 7?  
☐ No. STOP  
 You cannot take the child tax credit on Form 1040, line 52; Form 1040A, line 35; or Form 1040NR, line 49. You also cannot take the additional child tax credit on Form 1040, line 67; Form 1040A, line 43; or Form 1040NR, line 64. Complete the rest of your Form 1040, Form 1040A, or Form 1040NR.  
☒ Yes. Subtract line 7 from line 1. Enter the result. Go to Part 2 below. 8 2,000

**Part 2**

9. Enter the amount from Form 1040, line 47; Form 1040A, line 30; or Form 1040NR, line 45. 9 2,000

10. Add the following amounts from:

Form 1040	or	Form 1040A	or	Form 1040NR	
Line 48				Line 46	+
Line 49		Line 31		Line 47	+
Line 50		Line 33			+
Line 51		Line 34		Line 48	+
Form 5695, line 30					+
Form 8910, line 15					+
Form 8936, line 23					+
Schedule R, line 22					+

Enter the total. 10 2,000

11. Are you claiming any of the following credits?  
 • Mortgage interest credit, Form 8396.  
 • Adoption credit, Form 8839.  
 • Residential energy efficient property credit, Form 5695, Part I.  
 • District of Columbia first-time homebuyer credit, Form 8859.  
☒ No. Enter the amount from line 10.  
☐ Yes. Complete the Line 11 Worksheet on the next page to figure the amount to enter here.

12. Subtract line 11 from line 9. Enter the result. 12 2,000

13. Is the amount on line 8 of this worksheet more than the amount on line 12?  
☐ No. Enter the amount from line 8.  
☒ Yes. Enter the amount from line 12. See the TIP below. 13 2,000

**TIP**

You may be able to take the additional child tax credit on Form 1040, line 65; Form 1040A, line 39; or Form 1040NR, line 63, only if you answered "Yes" on line 13.

• First, complete your Form 1040 through line 64a (also complete line 69), Form 1040A through line 38a, or Form 1040NR through line 62 (also, complete line 65).

• Then, use Parts II through IV of Schedule 8812 to figure any additional child tax credit.

Enter this amount on  
 Form 1040, line 52;  
 Form 1040A, line 35;  
 or Form 1040NR, line 49.

WK\_8812.LD



## 1040 and 1040NR Filers - Earned Income Worksheet

2014

(Keep for your records)

Name(s) as shown on return

Your social security number

DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ

**Before you begin:**

- Use this worksheet only if you were sent here from the Line 11 Worksheet earlier in this publication or line 4a of Schedule 8812, Child Tax Credit.
- Disregard community property laws when figuring the amounts to enter on this worksheet.
- If married filing jointly, include your spouse's amounts with yours when completing this worksheet.

1. a.	Enter the amount from Form 1040, line 7, or Form 1040NR, line 8	1a.	28,394
b.	Enter the amount of any nontaxable combat pay received. Also enter this amount on Schedule 8812, line 4b. This amount should be shown in Form(s) W-2, box 12, with code Q	1b.	
	Next, if you are filing Schedule C, C-EZ, F, or SE, or you received a Schedule K-1 (Form 1065 or Form 1065-B), go to line 2a. Otherwise, skip lines 2a through 2e and go to line 3.		
2. a.	Enter any statutory employee income reported on line 1 of Schedule C or C-EZ	2a.	
b.	Enter any net profit or (loss) from Schedule C, line 31; Schedule C-EZ, line 3; Schedule K-1 (Form 1065), box 14, code A (other than farming); and Schedule K-1 (Form 1065-B), box 9, code J1.* Reduce any Schedule K-1 amounts as described in the instructions for completing Schedule SE in the Partner's Instructions for Schedule K-1. Do not include on this line any statutory employee income or any other amounts exempt from self-employment tax. Options and commodities dealers must add any gain or subtract any loss (in the normal course of dealing in or trading section 1256 contracts) from section 1256 contracts or related property	2b.	
c.	Enter any net farm profit or (loss) from Schedule F, line 34, and from farm partnerships, Schedule K-1 (Form 1065), box 14, code A.* Reduce any Schedule K-1 amounts as described in the instructions for completing Schedule SE in the Partner's Instructions for Schedule K-1. Do not include on this line any amounts exempt from self-employment tax	2c.	
d.	If you used the farm optional method to figure net earnings from self-employment, enter the amount from Schedule SE, Section B, line 15. Otherwise, skip this line and enter on line 2e the amount from line 2c	2d.	
e.	If line 2c is a profit, enter the smaller of line 2c or line 2d. If line 2c is a (loss), enter the (loss) from line 2c	2e.	
3.	Combine lines 1a, 1b, 2a, 2b, and 2e. If zero or less, stop. Do not complete the rest of this worksheet. Instead, enter -0- on line 2 of the Line 11 Worksheet or line 4a of Schedule 8812, whichever applies	3.	28,394
4.	Enter any amount included on line 1a that is:		
a.	A scholarship or fellowship grant not reported on Form W-2	4a.	
b.	For work done while an inmate in a penal institution (enter "PRI" and this amount on the dotted line next to line 7 of Form 1040 or line 8 of Form 1040NR)	4b.	
c.	A pension or annuity from a nonqualified deferred compensation plan or a nongovernmental section 457 plan (enter "DFC" and this amount on the dotted line next to line 7 of Form 1040 or line 8 of Form 1040NR). This amount may be shown in box 11 of your Form W-2. If you received such an amount but box 11 is blank, contact your employer for the amount received as a pension or annuity	4c.	
5. a.	Enter any amount included on line 3 that is also included on Form 2555, line 43, or Form 2555-EZ, line 18. Do not include any amount that is also included on line 4a, 4b, or 4c above	5a.	
b.	Enter the portion, if any, of the amount from Form 2555, line 44 that you also included on Schedule E in partnership net income or (loss) or deducted on Form 1040, line 27 or Form 1040NR, line 27; Schedule C; Schedule C-EZ; or Schedule F	5b.	
c.	Subtract line 5b from line 5a	5c.	
6.	Enter the amount from Form 1040, line 27, or Form 1040NR, line 27	6.	
7.	Add lines 4a through 4c, 5c, and 6	7.	
8.	Subtract line 7 from line 3	8.	28,394

- If you were sent here from the Line 11 Worksheet, enter this amount on line 2 of that worksheet.
- If you were sent here from Schedule 8812, enter this amount on line 4a of that form.

\* If you have any Schedule K-1 amounts and you are not required to file Schedule SE, complete the appropriate line(s) of Schedule SE, Section A. Put your name and social security number on Schedule SE and attach it to your return.

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# **Carryover Worksheet** **List of items that will carryover to the 2015 tax return**

2014

(Keep for your records)

Name(s) as shown on return

Your social security number

DIMAS RODRIGUEZ INGUANZO &amp; ANA LA CRUZ

**Itemized Deductions**

Carryover Amount

Contributions subject to 100% of AGI limitations	
Contributions subject to 50% of AGI limitations	
Contributions subject to 30% of AGI limitations (50% capital gains appreciated property)	
Contributions subject to 30% of AGI limitations	
Contributions subject to 20% of AGI limitations (30% capital gains appreciated property)	
Taxable state and local refunds to Form 1040, line 10	
State/local taxes paid in 2015 to flow to the Schedule A	
Preparer Fee to flow to the Schedule A	192
State donations and contributions carryover	
State overpayment applied to next year	

**Expenses**

Office in home operating expenses	
Office in home excess casualty losses and depreciation	
Disallowed investment interest expense	
Section 179 expense	
Operating expenses, from Form WK_E, Sch E - Rental limitation on deductions when used for personal use	
Excess depreciation, from Form WK_E, Sch E - Rental limitation on deductions when used for personal use	

**Losses**

Short-term capital loss	
Long-term capital loss	
Net operating loss	AMT
Nonrecaptured net section 1231 losses	

**Credits**

Mortgage interest credit	
General business credit (should be carried back before being carried forward)	
Credit for prior year minimum tax	
Foreign Tax credit	AMT
District of Columbia first time home owner's credit	
Res. energy efficient property credit	

**Other**

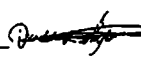
Overpayment applied to next year's estimates	
Federal tax liability for 2210 calculation	0
State tax liability for state 2210 calculation	
IRA basis	Taxpayer Spouse

**Passive Activity**


**At Risk Limitations**


WK\_CARRY.LD

PL\_Docs 0100

Account Transaction Summary		2014						
Name(s) as shown on return	Your ID Number							
DIMAS RODRIGUEZ INGUANZO & ANA LA CRUZ	XXX-XX-2745							
<p><b>**** Republic Bank Product ****</b></p> <p>You are getting this message because you have chosen a bank product. A temporary account has been setup by RB through which the refund product will be routed:</p> <p>Account #1</p> <p>Financial Institution Name REPUBLIC BANK AND TRUST</p> <p>Routing Transit Number [REDACTED] 1809</p> <p>Account Number [REDACTED] 2745</p> <p>Account Type Checking</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%;">Federal Deposit</td> <td style="width: 10%; text-align: right;">2,001</td> <td style="width: 50%;"></td> </tr> <tr> <td>Net Deposit</td> <td style="text-align: right; border-top: 1px solid black;">2,001</td> <td></td> </tr> </table> <p>The preparer will issue a check for the total refund (minus fees).</p> <p><b>**** End of Bank Product ****</b></p>			Federal Deposit	2,001		Net Deposit	2,001	
Federal Deposit	2,001							
Net Deposit	2,001							
<p>PLEASE VERIFY BANK INFORMATION</p> <ol style="list-style-type: none"> <li>1. Bank Name</li> <li>2. Bank Routing Transit Number</li> <li>3. Bank Account Number</li> <li>4. Bank Account Type</li> </ol> <p>This information is used to deposit your refund or to pay any amount due. If you have provided incorrect information, or you have closed the account, you are responsible.</p> <p>I have reviewed the above information and certify that this information is correct and authorize to use this account to deposit my refund.</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 45%;"> <p style="text-align: center;">               Digitally signed by DIMAS RODRIGUEZ INGUANZO@DD, PMT              Date: 2015.02.09 17:07:04 -06:00              _____              Date           </p> </div> <div style="width: 45%;"> <p style="text-align: center;">             Ana M de la Cruz J              Digitally signed by ANA MARIA D LA CRUZ@DD, PMT              Date: 2015.02.09 17:05:50 -06:00              _____              Date           </p> </div> </div>								

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PL\_Docs 0101

Form **8965****Health Coverage Exemptions**

OMB No. 1545-0074

Department of the Treasury  
Internal Revenue Service

▶ Attach to Form 1040, Form 1040A, or Form 1040EZ.

▶ Information about Form 8965 and its separate instructions is at [www.irs.gov/form8965](http://www.irs.gov/form8965).**2014**Attachment  
Sequence No. **75**

Name as shown on return

**DIMAS RODRIGUEZ INGUANZO**

Your social security number

Complete this form if you have a Marketplace-granted coverage exemption or you are claiming a coverage exemption on your return.

**Part I****Marketplace-Granted Coverage Exemptions for Individuals:** If you and/or a member of your tax household have an exemption granted by the Marketplace, complete Part I.

	a Name of Individual	b SSN	c Exemption Certificate Number
1			
2			
3			
4			
5			
6			

**Part II****Coverage Exemptions for Your Household Claimed on Your Return:**7a Are you claiming an exemption because your household income is below the filing threshold? ..... ☐ Yes ☒ Nob Are you claiming a hardship exemption because your gross income is below the filing threshold? ..... ☐ Yes ☒ No**Part III****Coverage Exemptions for Individuals Claimed on Your Return:** If you and/or a member of your tax household are claiming an exemption on your return, complete Part III.

	a Name of Individual	b SSN	c Exemption Type	d Full Year	e Jan	f Feb	g Mar	h Apr	i May	j June	k July	l Aug	m Sept	n Oct	o Nov	p Dec
8			G	X												
9			G	X												
10			G	X												
11			G	X												
12			G	X												
13																

For Privacy Act and Paperwork Reduction Act Notice, see your tax return instructions.

Form 8965 (2014)

EEA

Form

Department of the Treasury - Internal Revenue Service

**1040A****U.S. Individual Income Tax Return** (SS)**2013**

IRS Use Only - Do not write or staple in this space.

Your first name and initial <b>DIMAS</b>		Last name <b>RODRIGUEZ INGUANZO</b>		OMB No. 1545-0074
If a joint return, spouse's first name and initial <b>ANA MARIA D</b>		Last name <b>LA CRUZ</b>		Your social security number [REDACTED]
Home address (number and street). If you have a P.O. box, see instructions. <b>1910 S JOSEY</b>			Apt. no. <b>159</b>	<p>▲ Make sure the SSN(s) above and on line 6c are correct.</p> <p><b>Presidential Election Campaign</b> Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund. <input type="checkbox"/> You <input type="checkbox"/> Spouse</p>
City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions). <b>CARROLLTON TX 75006</b>				
Foreign country name		Foreign province/state/country	Foreign postal code	

**Filing status**

1 ☐ Single

2 ☒ Married filing jointly (even if only one had income)

3 ☐ Married filing separately. Enter spouse's SSN above and full name here. ▼

4 ☐ Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here.

5 ☐ Qualifying widow(er) with dependent child (see instructions)

**Exemptions**

6 a ☒ Yourself. If someone can claim you as a dependent, do not check box 6a.

b ☒ Spouse

c Dependents:

(1) First name	Last name	(2) Dependent's social security number	(3) Dependent's relationship to you	(4) If child under age 17 qualifying for child tax credit (see instructions)	<input type="checkbox"/> lived with you <input type="checkbox"/> did not live with you due to divorce or separation (see instr) Dependents on 6c not entered above	
[REDACTED]	[REDACTED]	[REDACTED]	Son	<input checked="" type="checkbox"/>	4	
[REDACTED]	[REDACTED]	[REDACTED]	Son	<input type="checkbox"/>		
[REDACTED]	[REDACTED]	[REDACTED]	Son	<input checked="" type="checkbox"/>		
[REDACTED]	[REDACTED]	[REDACTED]	Daughter	<input checked="" type="checkbox"/>		
					<input type="checkbox"/>	
					<input type="checkbox"/>	

d Total number of exemptions claimed. Add numbers on lines above **6**

**Income**

7 Wages, salaries, tips, etc. Attach Form(s) W-2. **15,743**

8 a Taxable interest. Attach Schedule B if required. **8a**

b Tax-exempt interest. Do not include on line 8a. **8b**

9 a Ordinary dividends. Attach Schedule B if required. **9a**

b Qualified dividends (see instructions). **9b**

10 Capital gain distributions (see instructions). **10**

11 a IRA distributions. **11a**

11 b Taxable amount (see instructions). **11b**

12 a Pensions and annuities. **12a**

12 b Taxable amount (see instructions). **12b**

13 Unemployment compensation and Alaska Permanent Fund dividends. **13**

14 a Social security benefits. **14a**

14 b Taxable amount (see instructions). **14b**

15 Add lines 7 through 14b (far right column). This is your total income. **15 15,743**

**Adjusted gross income**

16 Educator expenses (see instructions). **16**

17 IRA deduction (see instructions). **17**

18 Student loan interest deduction (see instructions). **18**

19 Tuition and fees. Attach Form 8917. **19**

20 Add lines 16 through 19. These are your total adjustments. **20**

21 Subtract line 20 from line 15. This is your adjusted gross income. **21 15,743**

For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see separate instructions.

Form 1040A (2013)

EEA

PL\_Docs 0111

<b>22</b>	<b>Enter the amount from line 21 (adjusted gross income).</b>	<b>22</b>	<b>15,743</b>
-----------	---	-----------	---------------

<b>23a</b>	<b>Check</b>	<b>{</b>	<input type="checkbox"/>	<b>You were born before January 2, 1949,</b>	<input type="checkbox"/>	<b>Blind</b>	<b>}</b>	<b>Total boxes</b>	
			<b>if:</b>	<input type="checkbox"/>	<b>Spouse was born before January 2, 1949,</b>	<input type="checkbox"/>			
								<b>checked</b>	<b>▶ 23a</b>

**b** If you are married filing separately and your spouse itemizes deductions, check here

24	Enter your standard deduction.	24	12,200
----	--------------------------------	----	--------

25	Subtract line 24 from line 22. If line 24 is more than line 22, enter -0-.	25	3,543
----	--	----	-------

26	Exemptions. Multiply \$3,900 by the number on line 6d.	26	23,400
----	--	----	--------

**27** Subtract line 26 from line 25. If line 26 is more than line 25, enter -0-.

**This is your taxable income.** ▶ 27 0

<b>28</b>	<b>Tax, including any alternative minimum tax (see instructions).</b>	<b>28</b>	<b>0</b>
-----------	---	-----------	----------

**29** Credit for child and dependent care expenses. Attach Form 2441. **29**

**30** Credit for the elderly or the disabled. Attach  
Schedule R. **30**

<b>31</b>	<b>Education credits from Form 8863, line 19.</b>	<b>31</b>
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<b>32</b>	Retirement savings contributions credit. Attach Form 8880.	<b>32</b>
-----------	--	-----------

<b>33</b>	<b>Child tax credit. Attach Schedule 8812, if required.</b>	<b>33</b>
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**34** Add lines 29 through 33. These are your total credits. **34**

35	Subtract line 34 from line 28. If line 34 is more than line 28, enter -0-. This is your total tax.	35	0
----	--	----	---

36	Federal income tax withheld from Forms W-2 and 1099.	36
----	--	----

37	2013 estimated tax payments and amount applied from 2012 return.	37
----	--	----

38a	Earned income credit (EIC).	38a	NO
-----	-----------------------------	-----	----

b	Nontaxable combat pay election.	38b
---	---------------------------------	-----

39	Additional child tax credit. Attach Schedule 8812.	39	1,911
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<b>40</b>	<b>American opportunity credit from Form 8863, line 8.</b>	<b>40</b>
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41	Add lines 36, 37, 38a, 39, and 40. These are your <b>total payments</b> .	41	1,911
----	---	----	-------

42	If line 41 is more than line 35, subtract line 35 from line 41. This is the amount you overpaid.	42	1,911
----	---	----	-------

43a	Amount of line 42 you want refunded to you. If Form 8888 is attached, check here	43a	1,911
-----	--	-----	-------

► b	Routing	X	X	X	X	X	X	X	X	► c Type:	Checking	Savings
-----	---------	---	---	---	---	---	---	---	---	-----------	----------	---------

[illegible]

44	Amount of line 42 you want applied to your 2014 estimated tax.	44
----	---	----

**45** Amount you owe. Subtract line 41 from line 35. For details on how to pay, see instructions. ▶ 45

16	Estimated tax penalty (see instructions).	46
----	---	----

Do you want to allow another person to discuss this return with the IRS (see instructions)? ☐ Yes. Complete the following. ☒ No

Designee's name  Phone no.  Personal identification number (PIN)

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and accurately list all amounts and sources of income I received during the tax year. Declaration of preparer (other than the taxpayer) is based on all information of which the preparer has any knowledge.

Your signature _____ _____	Date _____	Your occupation _____	Daytime phone number _____
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2-26-204 630-618-6741

Spouse's signature. If a joint return, both must sign.	Date 3/31/2011	Spouse's occupation	If the IRS sent you an Identity Protection PIN, enter it here (see inst.)
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[illegible]

Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
----------------------	------	---	------

Print/Type preparer's name \_\_\_\_\_

Firm's name ▶	Firm's EIN ▶
---------------	--------------

Firm's address  Phone no.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466
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Form **W-7**  
(Rev. August 2013)  
Department of the Treasury  
Internal Revenue Service

# Application for IRS Individual Taxpayer Identification Number

► For use by individuals who are not U.S. citizens or permanent residents.  
► See instructions.

OMB No. 1545-0074

An IRS individual taxpayer identification number (ITIN) is for federal tax purposes only.

FOR IRS USE ONLY

## Before you begin:

- Do not submit this form if you have, or are eligible to get, a U.S. social security number (SSN).
- Getting an ITIN does not change your immigration status or your right to work in the United States and does not make you eligible for the earned income credit.

**Reason you are submitting Form W-7.** Read the instructions for the box you check. **Caution:** If you check box b, c, d, e, f, or g, you must file a tax return with Form W-7 unless you meet one of the exceptions (see instructions).

- a ☐ Nonresident alien required to get ITIN to claim tax treaty benefit
- b ☒ Nonresident alien filing a U.S. tax return
- c ☐ U.S. resident alien (based on days present in the United States) filing a U.S. tax return
- d ☐ Dependent of U.S. citizen/resident alien } Enter name and SSN/ITIN of U.S. citizen/resident alien (see instructions) ► \_\_\_\_\_
- e ☐ Spouse of U.S. citizen/resident alien }
- f ☐ Nonresident alien student, professor, or researcher filing a U.S. tax return or claiming an exception
- g ☐ Dependent/spouse of a nonresident alien holding a U.S. visa
- h ☐ Other (see instructions) ► \_\_\_\_\_

Additional information for a and f: Enter treaty country ► \_\_\_\_\_ and treaty article number ► \_\_\_\_\_

<b>Name</b> (see instructions) Name at birth if different . . . . .	1a First name	Middle name	Last name
	ANA	MARIA	DE LA CRUZ INGUANZO
<b>Applicant's mailing address</b>	1b First name	Middle name	Last name
<b>Foreign (non-U.S.) address</b> (if different from above) (see instructions)	2 Street address, apartment number, or rural route number. If you have a P.O. box, see separate instructions.		
	1910 S JOSEY APT 159 City or town, state or province, and country. Include ZIP code or postal code where appropriate. CARROLLTON TX 75006		
<b>Birth information</b>	3 Street address, apartment number, or rural route number. Do not use a P.O. box number.		
	City or town, state or province, and country. Include ZIP code or postal code where appropriate.		
<b>Other information</b>	4 Date of birth (month / day / year)	Country of birth	City and state or province (optional)
		MEXICO	JEREZ ZAC
	5a Country(ies) of citizenship	5b Foreign tax I.D. number (if any)	5c Type of U.S. visa (if any), number, and expiration date
	Mexico		
	6d Identification document(s) submitted (see instructions)		
	<input checked="" type="checkbox"/> Passport <input type="checkbox"/> Driver's license/State ID <input type="checkbox"/> USCIS documentation <input type="checkbox"/> Other _____ Issued by: _____ No.: _____ Exp. date: _____ Date of entry into the United States (MM/DD/YYYY)		
6e Have you previously received a Internal Revenue Service Number (IRSIN) or employer identification number (EIN)?			
<input checked="" type="checkbox"/> No/Do not know. Skip line 6f. <input type="checkbox"/> Yes. Complete line 6f. If more than one, list on a sheet and attach to this form (see instructions).			
6f Enter IRSIN or EIN ► _____ and			
Name under which it was issued ► _____			
6g Name of college/university or company (see instructions) _____			
City and state _____ Length of stay _____			
<b>Sign Here</b>	Under penalties of perjury, I (applicant/delegate/acceptance agent) declare that I have examined this application, including accompanying documentation and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I authorize the IRS to disclose to my acceptance agent returns or return information necessary to resolve matters regarding the assignment of my IRS individual taxpayer identification number (ITIN), including any previously assigned taxpayer identifying number.		
	Signature of applicant (if delegate, see instructions)	Date (month / day / year)	Phone number
Keep a copy for your records.	Name of delegate, if applicable (type or print)	Delegate's relationship to applicant	<input type="checkbox"/> Parent <input type="checkbox"/> Court-appointed guardian <input type="checkbox"/> Power of Attorney
	Signature	Date (month / day / year)	Phone
<b>Acceptance Agent's Use ONLY</b>	Name and title (type or print)	Name of company	EIN
			PTIN
			Office Code

For Paperwork Reduction Act Notice, see separate instructions.  
EEA

Form W-7 (Rev. 8-2013)

PL\_Docs 0113



Department of Treasury  
Internal Revenue Service  
PO Box 149342  
Austin, TX 78714-9342

Notice CP565  
Notice date May 6, 2012  
To contact us Phone 1-866-968-9982  
International calls 267-941-1000

Case reference number 20294-102-55620-3  
Date of birth December 1, 1959  
Page 1 of 2

00652 104563 0005 001 3 184 411

DIMAS RODRIGUEZ INGUANZO  
1910 S JOSEY APT 279  
CARROLLTON TX 75006

10652

In response to your Individual Taxpayer Identification Number application

## Individual Taxpayer Identification Number (ITIN) assigned

We have assigned you an individual taxpayer identification number (ITIN) 927-98-2745 based on the information you provided in your application.

Please keep this notice in a secure place with your other important documents.

### Your ITIN and personal information

ITIN

Full name

DIMAS RODRIGUEZ INGUANZO

Date of birth

December 1, 1959

The IRS will use your ITIN along with your full name and date of birth to identify tax documents, payments, and any other correspondence. Therefore, it's very important that the personal information we have for you is correct. If the above information is incorrect, please fill out the Contact information section, detach, and mail to us.

Continued on back



DIMAS RODRIGUEZ INGUANZO  
1910 S JOSEY APT 279  
CARROLLTON TX 75006

Notice CP565  
Case reference number 20294-102-55620-3  
Notice date May 6, 2012

## Contact information

INTERNAL REVENUE SERVICE  
PO BOX 149342  
AUSTIN, TX 78714-9342

Name

Date of birth

Address

City

State

Country

Zip code

Daytime

Evening

Best time to call

Daytime

Evening

Best time to call

Primary phone

Secondary phone





a Employee's SSN	1 Wages, tips, other compensation	2 Federal income tax withheld
OMB No. 1545-0008	3 Social security wages	4 Social security tax withheld
b Employer identification number	5 Medicare wages and tips	6 Medicare tax withheld
c Employer's name, address, and ZIP code	7 Social security tips	8 Allocated tips
e Employee's first name and initial	9	10 Dependent care benefits
f Employee's address and Zip code	11 Nonqualified plans	12a
d Control number	12b	12c
13 Statutory employee	12d	14 Other
15 State Employer's state ID number	16 State wages, tips, etc.	17 State income tax
18 Local wages, tips, etc.	19 Local income tax	20 Locality name

Form **W-2** Wage and Tax Statement **2013** Department of Treasury-Internal Revenue Service  
Copy B - To Be Filed with Employee's FEDERAL Tax Return.

a Employee's SSN	1 Wages, tips, other compensation	2 Federal income tax withheld
OMB No. 1545-0008	3 Social security wages	4 Social security tax withheld
b Employer identification number	5 Medicare wages and tips	6 Medicare tax withheld
c Employer's name, address, and ZIP code	7 Social security tips	8 Allocated tips
e Employee's first name and initial	9	10 Dependent care benefits
f Employee's address and Zip code	11 Nonqualified plans	12a
d Control number	12b	12c
13 Statutory employee	12d	14 Other
15 State Employer's state ID number	16 State wages, tips, etc.	17 State income tax
18 Local wages, tips, etc.	19 Local income tax	20 Locality name

Form **W-2** Wage and Tax Statement **2013** Department of Treasury-Internal Revenue Service  
Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return.

a Employee's SSN	1 Wages, tips, other compensation	2 Federal income tax withheld
OMB No. 1545-0008	3 Social security wages	4 Social security tax withheld
b Employer identification number	5 Medicare wages and tips	6 Medicare tax withheld
c Employer's name, address, and ZIP code	7 Social security tips	8 Allocated tips
e Employee's first name and initial	9	10 Dependent care benefits
f Employee's address and Zip code	11 Nonqualified plans	12a
d Control number	12b	12c
13 Statutory employee	12d	14 Other
15 State Employer's state ID number	16 State wages, tips, etc.	17 State income tax
18 Local wages, tips, etc.	19 Local income tax	20 Locality name

Form **W-2** Wage and Tax Statement **2013** Copy C - For EMPLOYEE'S RECORDS.

This information is being furnished to the Internal Revenue Service. If you are required to file a tax return, a negligence penalty or other sanction may be imposed on you if this income is taxable and you fail to report it.

a Employee's SSN	1 Wages, tips, other compensation	2 Federal income tax withheld
OMB No. 1545-0008	3 Social security wages	4 Social security tax withheld
b Employer identification number	5 Medicare wages and tips	6 Medicare tax withheld
c Employer's name, address, and ZIP code	7 Social security tips	8 Allocated tips
e Employee's first name and initial	9	10 Dependent care benefits
f Employee's address and Zip code	11 Nonqualified plans	12a
d Control number	12b	12c
13 Statutory employee	12d	14 Other
15 State Employer's state ID number	16 State wages, tips, etc.	17 State income tax
18 Local wages, tips, etc.	19 Local income tax	20 Locality name

Form **W-2** Wage and Tax Statement **2013** Department of Treasury-Internal Revenue Service  
Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return.

FARMERS BRANCH  
 FARMERS BRANCH, Texas  
 752349998  
 4822710234-0096  
 03/04/2014 (800)275-8777 02:15:46 PM  
 =====  
 Sales Receipt  
 =====  

Product	Sale Unit	Final
Description	Qty Price	Price
@@ ~~ AUSTIN TX 78741 Zone-3 \$5.60		
Priority Mail 2-Day		
Flat Rate Env		
3.10 oz.		
Expected Delivery: Thu 03/06/14		
USPS Tracking #:		
9114901230801010805418		
Includes \$50 insurance		

=====  
 Issue PVI: \$5.60

=====  
 Total: \$5.60

Paid by:  
 Cash \$6.00  
 Change Due: -\$0.40

@@ For tracking or inquiries go to  
 USPS.com or call 1-800-222-1811.

~~ Save this receipt as evidence of  
 insurance. For information on filing  
 an insurance claim go to  
 usps.com/ship/file-domestic-claims..

Order stamps at [usps.com/shop](https://usps.com/shop) or  
call 1-800-Stamp24. Go to  
[usps.com/clicknship](https://usps.com/clicknship) to print  
shipping labels with postage. For  
other information call  
1-800-ASK-USPS.

\*\*\*\*\*  
\*\*\*\*\*  
Get your mail when and where you  
want it with a secure Post Office  
Box. Sign up for a box online at  
[usps.com/poboxes](https://usps.com/poboxes).  
\*\*\*\*\*  
\*\*\*\*\*

Bill#: 1000401830517  
Clerk:04

All sales final on stamps and postage  
Refunds for guaranteed services only  
Thank you for your business

\*\*\*\*\*  
\*\*\*\*\*  
HELP US SERVE YOU BETTER

Go to:  
<https://postalexperience.com/Pos>

TELL US ABOUT YOUR RECENT  
POSTAL EXPERIENCE

YOUR OPTINION COUNTS  
\*\*\*\*\*  
\*\*\*\*\*

Customer Copy

PL\_Docs 0105

0626386590  
May 16, 2014 LTR 12C 0 R  
201312 30  
00001930

DIMAS RODRIGUEZ INGUANZO &  
ANA MARIA D LA CRUZ  
1910 S JOSEY APT 159  
CARROLLTON TX 75006

of your fax. Your faxed signature(s) will become a permanent part of your filing. Don't send another copy by mail. Doing so could delay the processing of your return. Be sure to put your taxpayer identification number on each page faxed. Your cover sheet must contain the following information:

Date: \_\_\_\_\_  
Attention: ICD Rejects Team - AUSPC  
BATCH 27354,15  
IRS control number: \_\_\_\_\_

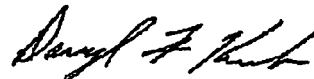
Your name: \_\_\_\_\_  
Your taxpayer identification number: \_\_\_\_\_  
(social security number/employer identification number)  
Tax Period: \_\_\_\_\_  
Number of pages faxed: \_\_\_\_\_

Whenever you write, include this letter and provide in the spaces below your telephone number with the hours we can reach you. Keep a copy of this letter for your records.

Your Telephone Number: ( ) \_\_\_\_\_ Hours \_\_\_\_\_

We apologize for any inconvenience and thank you for your cooperation.

Sincerely yours,



Darryl F. Krebs  
Mgr., Input Corrections Operations

BATCH 27354,15  
\_\_\_\_\_

Enclosures:  
Copy of this letter  
Envelope

Supporting Documentation	Can be used to establish:	
	Foreign status	Identity
Passport (the only stand-alone document)	x	x
U.S. Citizenship and Immigration Services (USCIS) photo identification	x	x
Visa issued by U.S. Department of State	x	x
U.S. driver's license		x
U.S. military identification card		x
Foreign driver's license		x
Foreign military identification card	x	x
National identification card (must be current and contain name, photograph, address, date of birth, and expiration date)	x	x
U.S. state identification card		x
Foreign voter's registration card	x	x
Civil birth certificate	x*	x
Medical records (valid only for dependents under age 6)	x*	x
School records (valid only for dependents under age 14 (under age 18 if a student))	x*	x

\* Can be used to establish foreign status only if they are foreign documents.

**Note.** Original documentation submitted for a dependent must include a civil birth certificate (unless a passport is submitted).

Keep a copy of your application for your records.

## When To Apply

Complete and attach Form W-7 when you file the tax return for which the ITIN is needed. However, if you meet one of the exceptions described later under *h. Other*, complete and submit Form W-7 as soon as possible after you determine you are covered by that exception.

Allow 6 weeks for the IRS to notify you of your ITIN (8 to 10 weeks if you submit documents during peak processing periods (January 15 through April 30) or if you are filing from overseas). If you have not received your ITIN or correspondence at the end of that time, you can call the IRS to find out the status of your application (see *Telephone help*, earlier).



**You cannot electronically file (e-file) a return using an ITIN in the calendar year the ITIN is issued; however, you can e-file returns in the following years. For example, if you apply for and receive an ITIN in 2014, you may not e-file any tax return using that ITIN (including prior year returns) until 2015.**

*If you need to file multiple year returns, you can either attach them all to your Form W-7 and submit them to the IRS, or file just the tax return which is due and wait until you receive your ITIN to file your prior year returns on paper. However, no returns may be e-filed in the calendar year in which you receive the ITIN.*

## Where To Apply

**By mail.** Mail Form W-7, your tax return (or other documents required by an exception), and the documentation described in item (3) and listed in the chart under *How To Apply*, earlier to:

Internal Revenue Service  
ITIN Operation  
P.O. Box 149342  
Austin, TX 78714-9342



**Do not use the mailing address in the instructions for your tax return.**

**Private delivery services.** If you use a private delivery service to submit your Form W-7, use the following address:

Internal Revenue Service  
ITIN Operation  
Mail Stop 6090-AUSC  
3651 S. Interregional, Hwy 35  
Austin, TX 78741-0000

**In person.** You can apply for an ITIN by bringing your completed forms and documentation to any IRS Taxpayer Assistance Center in the United States or IRS office abroad. Designated IRS Taxpayer Assistance Centers (TACs) will be able to verify passports and National ID documents and return them immediately. See [IRS.gov](http://IRS.gov) for a list of designated TACs that are available for assistance in completing applications and will forward documents to our processing center in Austin, Texas, for processing. Information on our overseas offices can be found in Pub. 1915 or at [IRS.gov](http://IRS.gov).

**Through an acceptance agent.** You also can apply through an Acceptance Agent (AA) authorized by the IRS. An AA can help you complete and file Form W-7. To get a list of agents, visit [IRS.gov](http://IRS.gov) and enter "acceptance agent program" in the search box at the top of the page. A Certified Acceptance Agent (CAA) can verify the original and, also, certified copies of identifying documents for primary and secondary applicants. The CAA should return the documents immediately after reviewing their authenticity. The CAA must attach a standard copy of the identifying documents reviewed. The copies of the documents and the Certificate of Accuracy must be attached to the Form W-7. The CAA must submit the original or certified document copies with dependent applications for an ITIN. An AA will need to submit originals or certified copies for all applicants when identifying documents are required. Even if an exemption to submit original identifying documents applies (e.g., military dependents), the CAA or AA will still need to submit standard copies of either the original or certified copies of the documents.

## Specific Instructions

If you are completing this form for someone else, answer the questions as they apply to that person.

## Reason For Applying

You must check the box to indicate the reason you are completing Form W-7. If more than one box applies to you, check the box that best explains your reason for submitting Form W-7.

**Note.** If you check box "a" or "f," then box "h" may also be checked. If applicable, you also must enter the treaty country and treaty article. For more information on treaties, see Pub. 901, U.S. Tax Treaties.

**a. Nonresident alien required to get an ITIN to claim tax treaty benefit.** Certain nonresident aliens must get an ITIN to claim certain tax treaty benefits even if they do not have to file a U.S. tax return. If you check this box to claim the benefits of a U.S. income tax treaty with a foreign country, also check box h. On the dotted line next to box h, enter the appropriate designation for Exception 1 or 2, whichever applies (see *Exception 1* and *Exception 2*, later). Identify the exception by its number, alpha subsection, and category under which you are applying (for example, enter "Exception 1d-Pension Income" or "Exception 2d-Gambling Winnings"). Submittal of original/ certified copies of identifying documents for applicants using the

DIMAS RODRIGUEZ INGUANZO & ANA MARIA D LA CRUZ Invoice Date: 02/26/2014  
 1910 S JOSEY APT 159  
 CARROLLTON, TX 75006

<u>Description of Charges</u>		<u>Price</u>
<b>Federal and Supplemental Forms</b>		
Form 1040A	-U.S. Individual Income Tax Return	\$ 98.00
Form 8812	-Additional Child Tax Credit	35.00
Form 9325	-General Information for Electronic Filing	
Form W-2	-Wage and Tax Statement	
Form W-2	-Wage and Tax Statement	
Form W-7	-Application for ITIN	85.00
Wksht 8812	-Form 8812 Worksheet - Child Tax Credit	
Comparison	-Tax Year Comparison Sheet	
Wksht CTC4	-Form 8812 Worksheet - Earned Income Calc	10.00
<b>Total Forms : 9</b>		<b>Forms Subtotal \$ 228.00</b>
		20% Discount (45.60)
		<b>Total Balance Due \$ 182.40</b>



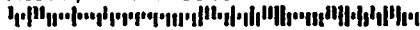
Department of Treasury  
Internal Revenue Service  
PO Box 149342  
Austin, TX 78714-9342

*copy*

Notice	CPS66
Notice date	March 24, 2014
To contact us	Phone 1-800-908-9982 International calls: 267-941-1000
Case reference number	[REDACTED]
Date of birth	January 4, 1968
Page 3 of 3	



INTERNAL REVENUE SERVICE  
PO BOX 149342  
AUSTIN, TX 78714-9342



003057

## Response Form

Complete this form, and mail it to us so we receive it by May 8, 2014. If you use the enclosed envelope, be sure our address shows through the window.

### Provide your contact information

If your address has changed, please make the changes below.

ANA MARIA DE LA CRUZ  
1910 S JOSEY APT 159  
CARROLLTON TX 75006

214-580-0311	8-2	<input checked="" type="checkbox"/> a.m.	<input type="checkbox"/> a.m.
	morning	<input type="checkbox"/> p.m.	<input type="checkbox"/> p.m.
Primary phone	Best time to call	Secondary phone	Best time to call

### 1. Complete the information missing from the W-7 you previously submitted

Please indicate your date of entry into the United States (Form W-7, line 6d).

01-10-2006  
Date of entry (MM/DD/YYYY)

### 2. Send this Response form to us

Mail your Response form to us along with any documentation so we receive it by May 8, 2014. If you're using your own envelope, mail your package to the address on this form.



Department of Treasury  
Internal Revenue Service  
PO Box 149342  
Austin, TX 78714-9342

<b>Notice</b>	CP566
<b>Notice date</b>	March 24, 2014
<b>To contact us</b>	Phone 1-800-908-9982 International calls: 267-941-1000
<b>Case reference number</b>	[REDACTED]
<b>Date of birth</b>	January 4, 1968
Page 1 of 3	

003057.280183.3230.3533 1 MB 0.435 701



ANA MARIA DE LA CRUZ  
1910 S JOSEY APT 159  
CARROLLTON TX 75006

003057

In response to your Individual Taxpayer Identification Number application

## We need information from you to process your Form W-7

We received your application for an Individual Taxpayer Identification Number (ITIN) (Form W-7) but can't process it until you send us information that is missing from your application.

### What you need to do immediately

#### Provide the information that was missing from your application

- Review your copy of the ITIN application (Form W-7) and make sure you answered all the questions.
- Complete the Response form at the end of this notice, and mail it to us (envelope enclosed) with your documentation so we receive it by May 8, 2014.

### If we don't hear from you

If we don't receive your Response form by May 8, 2014, your application will be denied. To have an ITIN assigned, you would have to submit a new application (Form W-7).

### Additional information

- Visit [www.irs.gov/cp566](http://www.irs.gov/cp566). You can also find the following online:
  - Form W-7 instructions (see "How to Apply and Specific Instructions for acceptable documentation")
  - Understanding Your IRS Individual Taxpayer Identification Number (ITIN) (Publication 1915)
  - U.S. Tax Guide for Aliens (Publication 519)
- You may qualify for assistance from a professional tax assistant at a Low Income Taxpayer Clinic that provides help at little or no charge. For additional information, download the Low Income Taxpayer Clinic List (Publication 4134) from [www.irs.gov](http://www.irs.gov) or call 1-800-829-3676 to request a copy.
- For tax forms, call 1-800-TAX-FORM (1-800-829-3676).
- Keep this notice for your records.

If you need assistance, please don't hesitate to contact us.



**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**DIMAS RODRIGUEZ, and all  
others similarly situated under  
29 U.S.C. 216 (b),  
Plaintiff,**

**V.**

**Cause No. 3:15-cv-3370-BK**

**SHAN NAMKEEN, INC.,  
and SHAILESH PATEL  
Defendants.**

## **PLAINTIFF'S INITIAL DISCLOSURES**

**NOW COMES** Plaintiff through the undersigned, and makes the following Initial Disclosures pursuant to the Federal Rules of Civil Procedure, Rule 26(a).

## GENERAL STATEMENT

As Plaintiff continues to obtain further information and documents through discovery and trial preparation, Plaintiff reserves the right to supplement and/or amend these disclosures as necessary and appropriate.

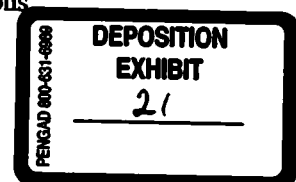
**F.R.C.P. 26(a)(1)(A)(i)** – the name, and if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

**RESPONSE:**

**The above-captioned Plaintiff.**

**The above-captioned Defendants.**

Those persons listed in Defendants' initial disclosures filed or to be filed, and any other persons identified in Plaintiff's or Defendants' discovery or identified in other pleadings, motions, depositions.



Plaintiff is not sure exactly what facts those individuals know but believe each of them has some degree of knowledge of Defendants' payment practices and Plaintiff's hours and duties. Plaintiff has knowledge regarding, *inter alia*, his job duties, pay and schedule generally.

**F.R.C.P. 26(a)(1)(A)(ii)** – a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

**RESPONSE:**

---

**Plaintiff's Counsel have in their possession:**

1. W-2's and copies of W-2's.
2. Paystubs and copies of paystubs.

**F.R.C.P. 26(a)(1)(A)(iii)** – a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

**RESPONSE:**

The following estimate is only preliminary and based on the allegations contained in the Complaint. This estimate is subject to change as discovery is ongoing.

**Overtime Damages for Dimas Rodriguez:**

Overtime damages as set out in Exhibit A attached hereto plus liquidated damages in an equal amount under 29 U.S.C. § 216(b).

**Minimum Wage Damages for Dimas Rodriguez:**

Minimum damages as set out in Exhibit A attached hereto plus liquidated damages in an equal amount under 29 U.S.C. § 216(b).

**Total Damages for Dimas Rodriguez = Total damages for overtime and minimum wage violations as set out in Exhibit A attached hereto plus liquidated damages in an equal amount under 29 U.S.C. § 216(b), attorney's fees, and costs.**

**F.R.C.P. 26(a)(1)(A)(iv)** – for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**RESPONSE:**

Plaintiff is currently unaware of such an insurance agreement.

Respectfully submitted,

  
By: /s/ Robert L. Manteuffel

Robert L. Manteuffel

Email: [rlmanteuffel@sbcglobal.net](mailto:rlmanteuffel@sbcglobal.net)

Texas Bar No. 12957529

J.H. Zidell

Texas Bar No. 24071840

**J.H. ZIDELL, P.C.**

6310 LBJ Freeway, Ste. 112

Dallas, Texas 75240

Tel: 972-233-2264

Fax: 972-386-7610

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing instrument was served via facsimile and certified mail or first class mail, on this the 8<sup>th</sup> day of April, 2016 upon the below listed counsel of record:

**Leonard I. Margolis**  
**MARGOLIS LAW FIRM**  
5300 Town and Country Blvd., Suite 170  
Frisco, Texas 75034  
Tel: 972-294-0200  
Fax: 469-605-2938

  
/s/ Robert L. Manteuffel  
Robert L. Manteuffel

## PLAINTIFF'S INITIAL DISCLOSURES

---

### EXHIBIT A

---

The following estimate is only preliminary and based on the allegations contained in the Complaint. This estimate is subject to change as discovery is ongoing.

---

**Overtime Damages for Dimas Rodriguez:**

- Completely unpaid hours during period June 15, 2013 through October 15, 2013

Overtime based on Federal Minimum Wage rate of \$7.25 per hour = \$3.63/hr. half-time rate

\$3.63/hr. x 3 half-time overtime hours per week x 17 weeks = \$185.13

- Weekend hours paid at straight time only during period June 15, 2013 through October 15, 2013

Overtime based on Federal Minimum Wage rate of \$7.25 per hour = \$3.63/hr. half-time rate

\$3.63/hr. x 8 half-time overtime hours per week x 12 weeks = \$348.48

- Completely unpaid hours during period October 16, 2013 through October 9, 2015

Overtime based on average wage rate of \$9.00 per hour = \$4.50/hr. half-time rate

\$4.50/hr. x 3 half-time overtime hours per week x 103 weeks = \$1,390.50

- Weekend hours paid at straight time only during period October 16, 2013 through October 9, 2015

Overtime based on average wage rate of \$9.00 per hour = \$4.50/hr. half-time rate

\$4.50/hr. x 8 half-time overtime hours per week x 72 weeks = \$2,592.00

**Total Overtime Damages for Dimas Rodriguez = \$4,516.11**

**Minimum Wage Damages for Dimas Rodriguez:**

- Completely unpaid time during period June 15, 2013 through October 9, 2015

Minimum wage deficiency based on Federal minimum wage of \$7.25/hr – average effective rate of \$0.00/hr = \$7.25/hr

$\$7.25/\text{hr} \times 3 \text{ hours per week} \times 121 \text{ weeks} = \$2,631.75$

- Deficiency for time paid at \$5.00/hr during period June 15, 2013 through October 15, 2013

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Minimum wage deficiency based on Federal minimum wage of \$7.25/hr – average effective rate of \$5.00/hr = \$2.25/hr

$\$2.25/\text{hr} \times 32 \text{ hours per week} \times 17 \text{ weeks} = \$1,224.00$

**Total Minimum Wage Damages for Dimas Rodriguez = \$3,877.50**

**Total Overtime and Minimum Wage Damages for Dimas Rodriguez = \$8,393.61**